

## **Importaco Group Modern Slavery and Human Trafficking Statement**

### **Organisational Structure, Business Activity and Supply Chain**

Importaco Group is an international food corporate group specialising in the production of nuts and mineral water. It was founded in Spain in 1940 and is currently one of the largest producers of dried fruits and nuts in Europe and the second largest mineral water group in Spain.

The Spanish company Importaco Nuts Company, S.L. (unipersonal) is the holding company of nuts division, to which Besana UK Limited and V. Besana Spa belongs (among others), being located and trading the first one in the UK, and the second being located in Italy and mainly trading in the UK.

Our business is built around the purpose of improving people's health and wellbeing, guaranteeing responsible production and consumption. Importaco Group, during its more than 80 years of history, has demonstrated its ability to adapt to the market, industry and consumers, which is reflected in its continued growth and its varied range of products and services. Quality, sustainability and innovation are the three fundamental pillars of its development, with a long-term vision.

Our activities in nuts division include the manufacture, production and distribution of nuts, snacks, chocolate-covered nuts, dried fruits and seeds. We currently operate in four different markets: the retail market in the Iberian Peninsula, the international retail market, the food service market and the ingredients market for the agri-food industry.

Our group, based in Valencia (Spain), has an extensive global presence. We have production centres in Spain (8), Italy (2), Poland (1), the United Kingdom (1) and Turkey (1), and purchasing offices in Argentina, the United States and China that cover the different nut and dried fruit growing areas.

Importaco Group works in partnership with suppliers, farmers and companies in the agri-food sector with the aim of supplying the most nutritious and safest food. Strategic and preferred suppliers account for approximately 80 % of the volume of raw materials, with whom long-term relationships are established to ensure food safety, quality and sustainability.

### **Core Commitment**

At Importaco Group we maintain an unconditional commitment to the eradication of modern slavery and labor exploitation in all its forms, promoting a world in which all people experience freedom, dignity and a fair treatment.

This commitment extends throughout our supply chain and to any entity with which we do business.

## **Responsibility**

The Board of Directors assumes overall and primary responsibility for the company's initiatives to combat modern slavery and to ensure that all persons under its jurisdiction comply fully with these initiatives.

## **Policy and Approach**

We have corporate codes and policies that are mandatory for the entire Importaco Group and are related to human rights compliance and the fight against modern slavery.

The participants in the company life, both internal and external, as regards the behaviours to be adopted, have a clear reference in the adopted code of ethics, which prescribes the rules of conduct to be followed and sets out the ethical principles relevant also for the prevention of the crimes referred to in the Italian Legislative Decree 231/2001 (V. Besana S.p.a. has adopted the management and control organization model pursuant to that specific regulation) and in other applicable regulations.

Annually, we continuously review and develop our policies with input from internal experts, suppliers and external stakeholders. Besides, we have:

- Commitment to comply with the Modern Slavery Act 2015.
- Commitment to comply with Italian L.D. 231/2001 purchasing procedures.
- Prohibition of modern slavery and labor exploitation in all operations and supply chain.
- Specific policies to prevent modern slavery in business decision making such as Zero Tolerance of Child Labor Procedure.
- Country-sector risk dossier based on Radar Sedex and Human Development Index.

## **Due Diligence Processes and Risk Assessment**

The identification of human rights and environmental risks is a fundamental part of the due diligence process. Importaco Group is committed to taking steps to proactively identify human rights and environmental risks arising from its own operations, subsidiaries, supply chain and established business relationships. In addition, we have a quality program at origin through which we collaborate with our suppliers to establish lines of work and common criteria based on quality, sustainability and food safety. This is carried out through the following two lines of work: auditing processes at origin and implementation of quality management systems in line with Importaco's culture of excellence.

To assess human rights and environmental risks, a risk assessment tool (Sedex Radar) is used, together with information from independent reports and audits, existing grievance mechanisms and consultation with potentially affected groups where deemed necessary, such as workers or farmers. This assessment allows us to identify and address possible cases of modern slavery.

## **Actions Taken:**

- Monitoring supplier SMETA 4P audits.
- Developing a new Supplier Engagement Project.
- Employee and supplier training and capacity building on business ethics.
- Development and update of a Code of Conduct for Suppliers that includes specific clauses against modern slavery and requires suppliers to comply with these standards.

- Commitment to publish an annual report detailing progress and challenges in implementing our policies and practices related to modern slavery.
- Development of a clear policy prohibiting modern slavery in all our operations and supply chain.
- Commitment to establish, maintain and update appropriate grievance procedures where human rights and supply chain and operations concerns can be raised by affected people, trade unions and civil society organizations.
- Working in collaboration with non-governmental organizations and government authorities to jointly address the problem of modern slavery.
- Implementing and improving our Whistleblower protection procedures.

### **Key performance indicators**

Importaco Group uses the following key performance indicators to measure our effectiveness in ensuring that slavery and human trafficking does not take place anywhere in the company or supply chain.

- SEDEX membership.
- SMETA 4P number of audits.
- Non conformities in the audit results (minor or major ones).
- SEDEX Radar Risk results.
- All-staff trained to understand the signs of potential modern slavery and/ or human trafficking.

### **Conclusion**

Addressing modern slavery in our supply chain requires us to continuously monitor and review procedures to prevent new forms or incidences of exploitation. With this statement Importaco Group wants to demonstrate a positive and proactive commitment to work together with its stakeholders, with particular attention to employee and labor representatives to protect workers and prevent exploitation.

### **Signature**

Importaco Nuts Company, S.L.

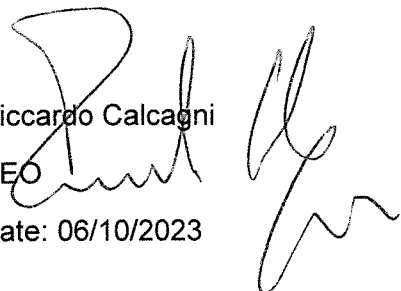
Besana Uk Limited & V.Besana S.p.A



Eva Maria Pons Casañ

Company Legal Representative

Date: 06/10/2023



Riccardo Calcagni

CEO

Date: 06/10/2023

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