



Annex A
Policy 3.

MODERN SLAVERY ACT TRANSPARENCY

FEBRUARY 2017

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1. Introduction

Argos Froyanes Limited strives to maintain best practice in all aspects of its activities and whilst it originates in a different jurisdiction, the company believes that it should use the requirements of the UK Modern Slavery Act 2015 as a framework for its policies in this area.

2. Scope

Argos Froyanes Limited is committed to promoting responsible corporate behaviour. The company firmly supports the implementation of the United Nations Global Compact's ten universal principles:

Argos Froyanes Limited will:

1. Support and respect the protection of internationally proclaimed human rights;
2. Make sure that it is not complicit in human rights abuses;
3. Uphold freedom of association and the effective recognition of the right to collective bargaining;



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4. Support the elimination of all forms of forced and compulsory labour;
5. Uphold the effective abolition of child labour;
6. Uphold the elimination of discrimination in respect of employment and occupation;
7. Support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility;
9. Encourage the development and diffusion of environmentally friendly technologies;
10. Work against corruption in all its forms including extortion and bribery.

3. Ethics and Conduct

Argos Froyanes Limited is committed to fighting human trafficking and human rights violations of any kind. We do this through our business ethics and employment code of conduct which is applicable to all members of our staff and to our supply chain. We have integrated this code into our recruitment and procurement procedures. It is comprised of 12 principles:

1. Business is conducted lawfully and with integrity;
2. Work is conducted on the basis of freely agreed and documented terms of employment in compliance with all applicable law;
3. All workers are treated equally and with dignity and respect;
4. Work is conducted on a voluntary basis with no compulsory or forced labour;
5. All workers are adults;
6. All workers are paid fair wages;
7. Working hours for all workers are reasonable;
8. All workers are free to exercise their right to form and/or join trades unions and to bargain collectively in accordance with applicable law;
9. Workers health and safety are protected at work;
10. Workers have access to fair procedures;
11. Business is carried on in a manner that reduces environmental impact and promotes sustainability;
12. Compliance with this code is monitored.

4. Staff

In furtherance of this code we ensure that in relation to our employee's, for example:

- All work clothing is provided by the company at no charge to the employee;
- Travel to and from vessels from the employee's home country is paid by the company;
- All transit accommodation is paid by the company;
- All crew members are given signed contracts on joining a vessel;



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All crew members receive a day rate from the day of arrival on the vessel to the day of leaving it, whether the vessel is in port, in transit or fishing;
All crew member employee's are given a written calculation of pay receivable;

5. Supply

Argos Froyanes Limited is fortunate, in comparison to some other fishing and seafood companies, in that its supply chains are fairly straightforward. The company is entirely devoted to wild capture of fish using a small number of vessels under its direct control.

The company has assessed risk in relation to the three key consumables supply chains, namely fuel, fishing gear and bait.

- a. Fuel is a fungible commodity product and it is not possible for the company to audit the supply chain.
- b. Bait may be sourced from identifiable suppliers or, more often, it is a fungible commodity product where it is not possible for the company to audit the supply chain. Where it is possible to identify suppliers we request confirmation from them that they adhere to our code of conduct or have similar policies of their own in place.
- c. Fishing gear is sourced from identifiable suppliers, mostly in Norway but also in New Zealand, both are jurisdictions with a good reputation for business ethics and treatment of staff. We request confirmation from these suppliers that they adhere to our code of conduct or have similar policies of their own in place.

Where we identify suppliers who engage in unfair or illegal labour practices they will be given a timeframe in which to rectify the position, failing which we will cease to deal with them.

James Ragg
Director
Argos Froyanes Limited