Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2020/21)

* The term ‘modern slavery’ used in this survey is taken to include forced labour, slavery, human trafficking, servitude, bonded and child labour.

**Company:** Ahold Delhaize

**Canned Tuna Brands:** Stop ‘n’ Shop, Giant, Delhaize, Albert, Alpha Beta, SuperIndo

**Human Rights Policy**

1. a. Since January 2019, has your company introduced any new human rights policies to address the risk of modern slavery* in its operations or supply chains? Yes / No
   If yes, please provide full details and a link.

   No (please refer to our response in 2019).

   b. Since January 2019, has your company revised or updated any of its existing human rights policies to address the risk of modern slavery in its operations or supply chains?

   No (please refer to our response in 2019).

2. Since January 2019, if your company has made a new commitment address modern slavery does it apply throughout your supply chains?

   Please refer to our response in 2019.
3. Since January 2019, has your company adopted or revised a responsible sourcing or supplier code of conduct that prohibits modern slavery?

No (please refer to our response in 2019).

**Human Rights Due Diligence Process**

4. Has your company mapped its tuna supply chains, in whole or part? Yes / No

Yes. We have mapped our supply chain for all suppliers to the last stage of production. In addition to compliance with our Standards of Engagement, we require social compliance (BSCI) whenever a ‘production location’ is based in a high risk country. We are also part of the Seafood Taskforce and signatory of the Tuna 2020 Traceability Declaration, and as a result we are working on mapping our tuna supply chains back to source.

5. Does the company source tuna from the Pacific region? Yes / No
   If yes, provide location (by country).

Yes, from the West-Pacific region.

6. Since January 2019, has your company adopted, or revised, a human rights due diligence policy, process or procedure to identify, assess and manage human rights risks (actual or potential), including modern slavery, in its operations (and those of its subsidiaries) and supply chains? Yes / No

If yes, please provide details and describe the human rights due diligence process. **Key steps include:** (i) identifying and assessing human rights impacts; (ii) integrating and acting on assessment findings; (iii) tracking the effectiveness of the company’s response; and (iv) communicating externally about how the company is addressing its human rights impacts.

Yes. In June 2020, Ahold Delhaize published its inaugural Human Rights Report, which outlines the steps we have taken to perform human rights due diligence and our Roadmap going forward.
The first step in the due diligence process was a review of policies and processes to gather insight in how Ahold Delhaize manages human rights across its businesses. The review made a particular effort to shine light on how to concretely and practically prioritize the work going forward.

The next step was to involve internal stakeholders in the review of policies and processes, as well as in the identification and assessment of human rights impacts. This approach created an opportunity to increase the broader organization’s awareness on human rights in a pro-active and real way. In practice, we conducted webinars, shared a questionnaire with relevant associates across our support offices and our brands, and a series of in-depth interviews with select associates across relevant functions.

The third step was to engage external stakeholders – an essential part of human rights due diligence. We conducted two workshops – one in the United States and one in Belgium – with our American and European stakeholders and we engaged Indonesian stakeholders through a survey. The workshops were facilitated by external experts, and helped us gather important insight into the expectations of our stakeholders in terms of identifying salient issues, our potential roadmap and their perspectives on the future.

We then consolidated the input of all three steps through a series of externally facilitated workshops with the working group, resulting – ultimately – in the overview of salient issues. However, we recognize that defining and identifying salient human rights issues is an ongoing process, and that is reflected in our Roadmap.
7. Since January 2019, has your company taken **practical action** to ensure that modern slavery does not occur in your company’s (or its subsidiaries’) operations and supply chains for tuna procurement from the Pacific? If yes, please describe.

Yes. Our Code of Ethics includes our commitment to respect human rights, and there is a comprehensive, annual Code of Ethics training in place internally. In addition, we engage with the industry through our membership of the Consumer Goods Forum, Seafood Taskforce, UN Global Compact and Tuna 2020 Traceability Declaration, our involvement with the Global Dialogue on Seafood Traceability and we require independent auditing in our supply chain.

8. If the company has taken steps to identify and address human rights risks, how does it (a) **prioritise** which risks to address first; and (b) assess and track the **effectiveness** of its actions and response?

See our [Human Rights Report](#).

**Grievance Mechanism**

9. Since January 2019, per the [UN Guiding Principles on Business and Human Rights](#), has your company adopted, or made changes to improve, a **grievance/complaints mechanism** through which workers, including fishers in your supply chains, can raise concerns about human rights? Yes / No

If so, can they access this in their own language and in a way that allows grievances, or concerns, to be reported safely, in confidence and without intimidation? Have any human rights concerns connected with the Pacific tuna sector been reported via your company’s complaints mechanism? Please provide details.

We have recently expanded the availability of our whistleblower lines to third parties within or connected to our Supply Chain. We are in the process of actively promoting this availability on our external website and communications as well as within our supply chain. No human rights concerns connected with the Pacific tuna sector have been reported via our whistleblower line.
10. Since January 2019, have you introduced a corrective or remediation plan if instances of modern slavery are identified in your operations, or supply chains? Can you describe it?

   No.

11. How many instances of modern slavery has your company identified over the last 3 years (from and including 2018) in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific?

   Please describe by reference to:
   (a) Number of instances (broken down for each calendar year)
       None.
   (b) Do you know where they occurred? Please describe event(s).
   (c) How did the company respond to address the issue(s)?

**Reporting**

12. Does your company communicate, or report, externally on steps taken to address modern slavery? Yes / No

   Yes. See our [Human Rights Report](#) and Roadmap, as well as our Annual Report 2019 for our social compliance metrics.

**Other information**

13. Since January 2019, has your company encountered obstacles or challenges in implementing its human rights commitments, taking practical action against modern slavery in tuna supply chains and/or in relation to any of the areas mentioned above? Yes / No

   If yes, please explain and provide details of any strategies to overcome them.

   Yes. See under COVID-19 impacts.
14. Since January 2019, has your company joined or been active in any regional, or sectoral, 
**multi-stakeholder initiatives** that address modern slavery in fishing?

If yes, please provide details.

We are active in the Seafood Taskforce and the Tuna 2020 Traceability Declaration 
(please refer to our response in 2019). We are also involved with the Global Dialogue on 
Seafood Traceability (GDST).

15. Please provide any **other information** about your company’s policies and practices on 
human rights that may be relevant.

**COVID-19 impacts**

16. Has the **COVID-19** pandemic affected your ability to identify, assess or respond to modern 
slavery risks in your tuna supply chains?

Please explain and provide details, including any actions (a) taken or (b) delayed/
suspended, by you.

Yes.

As a result, Ahold Delhaize co-signed a letter (see [link](#)) addressed to the UN Secretary 
General Mr António Guterres. The letter calls on Mr Guterres to encourage governments 
to take immediate action to ensure consumer goods companies can continue to serve 
their customers with the essential goods they need and to recognise seafarers as “key 
workers”. This in response to new regulatory restrictions designed to contain the spread 
of Covid-19 that have had a major impact on maritime supply chains and seafarers’ 
wellbeing.