



Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2018/19)

*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

Human Rights Policy

1. Has your company made a public commitment to respect **human rights**? If so, please provide a link.

Yes - <https://www.aholddelhaize.com/en/about-us/stakeholder-interests/human-rights/>

2. If yes, does the company's commitment address **modern slavery*** and does it apply throughout your supply chains? Please provide details.

As part of our HR position we state:

Working Conditions - We strive to ensure that all of our suppliers demonstrate a high standard of business ethics and regard for human rights, and that our products are safe, high quality, and produced in clean, safe and efficient facilities with good working conditions. Our expectations are outlined in the Standards of Engagement, which form part of every buying agreement.

Link: <https://www.aholddelhaize.com/en/about-us/code-of-ethics/our-standards-of-engagement/> (SoE)

We require Business Social Compliance Initiative (BSCI) audit reports – or audit reports or certificates that we consider equivalent to BSCI – from all our suppliers with production

locations in high risk countries (as defined by BSCI). In recent years, we have committed significant resources to selecting our suppliers, monitoring their performance and supporting them in making improvements to their processes and working conditions. If we find child labor, **forced labor** or serious violations of occupational health and safety regulations, we will suspend our relationship with that supplier. In addition, if a supplier is unable or unwilling to remedy non-compliances, we also suspend our relationship with that supplier.

Industry Collaboration - We work together with industry organizations to drive food safety and social and environmental sustainability. In addition, we take an active role in various committees and working groups, including those of the Business Social Compliance Initiative, to address human rights issues in collaboration with the business community and other relevant stakeholders.

3. Does the company have a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Please provide details.

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part?

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

5. Does the company source tuna from the **Pacific** region?

Yes

6. Does your company have 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?

If so, 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 findings*; (iii) *tracking* the effectiveness of the company's response; and (iv) *communicating externally* about how the company is addressing its human rights impacts.

As part of our annual risk assessment all product categories are being assessed for multiple risk drivers, one of them being working conditions/ human rights in the supply chain and our own operation. In addition, Ahold Delhaize started last year a thorough due diligence process, to identify salient human rights issues in the supply chain to take our responsibility and to make sure we have all potential issues in scope. Results will be addressed in 2019 depending on the outcome and actions will be taken, tracked and monitored, and external communications will be considered.

7. Has the company taken **practical action** to ensure that modern slavery does not occur in the company's (or its subsidiaries') operations and supply chains for tuna procurement from the Pacific? If so, please describe.

No slavery in our own operations. Annual training of sourcing managers, industry engagement (member of the Seafood Taskforce, UN Global Compact and Tuna 2020 Traceability Declaration), independent auditing.

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?

Due diligence is ongoing – results towards Summer will lead to actions in 2019.

9. Per the UN Guiding Principles on Business and Human Rights, does your company have a **grievance/ complaints mechanism** through which workers, including fishers in your supply chains, can raise concerns about human rights? 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 the company's complaints mechanism? Please provide details.

While we strive to keep an open dialogue with all our associates and other stakeholders such as suppliers and customers, we realize it may not be possible to be aware of every incident in the workplace. Therefore, we provide a whistleblower line for times such as this. To ensure confidentiality and, when requested, anonymity, the whistleblower line is administered by a third party and is available via an online portal or by telephone 24 hours a day, 7 days a week, 365 days per year. All reports are forwarded to the appropriate internal resource for review and prompt response or investigation. All reports are treated confidentially, so callers can feel comfortable providing useful information without fear of retaliation.

See report: <https://www.aholddelhaize.com/media/4905/ahold-delhaize-whistleblower-line-report.pdf>

From suppliers we require in addition to compliance to the SoE, to establish an adequate complaint mechanism for employees who believe they have been mistreated, and to ensure no retaliation against employees who raise complaints in good faith. No complaints related to the tuna sector have been received by our company.

10. Do you have a corrective or **remediation plan** if instances of modern slavery are identified in your operations, or supply chains? Can you describe it?

When slavery has been identified AD will suspend sourcing from the supplier and work with them to make sure measures are taken before business is being continued. Third party verification in this case is required to ensure proper mitigating actions have been taken.

11. How many **instances** of modern slavery has your company **identified** in 2018 in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific? Do you know where they occurred and can you describe them? How did the company respond to address the issue(s)?

No instances of modern slavery related to tuna procurement have been identified by our company.

Reporting

12. Does the company communicate, or **report**, externally on steps taken to address modern slavery? If yes, please provide details.

See report: <https://www.aholddelhaize.com/media/4905/ahold-delhaize-whistleblower-line-report.pdf>

In addition, we reported the following in our 2017 Annual Report: In 2017, our brands' whistle blower lines received 6,817 reports. Approximately 34% of the reports were made anonymously. On average, 94% of the reports were investigated and resolved within the quarter in which they were received. In 2017, there were no substantiated reports of significant financial reporting, accounting, fraud or ethical violations. **See page 110.**

Other information

13. 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? If so, please explain and provide details of any strategies to overcome them.

Traceability is difficult as is social compliance on boats, and insight into recruitment agencies operating along the supply chain is currently very challenging. By working together with other companies in the Seafood Taskforce and on the Tuna 2020 Traceability Declaration we are working to overcome these challenges.

14. Does the company participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing, eg:
- a) Seafood Task Force;
- Yes
- b) Bali Process Government and Business Forum;

No

c) Tuna 2020 Traceability Declaration; and

Yes

d) other?

Global Dialogue on Seafood Traceability

If yes, please provide details.

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

Thank you.

Further information and guidance:

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UK Modern Slavery Act \(2015\)](#)
- [Californian Transparency in Supply Chains Act](#)
- [ILO Forced Labour Convention, 1930 \(No. 29\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ILO Work in Fishing Convention, 2007 \(No. 188\)](#)
- [Seafood Task Force](#)
- [Bali Process Government and Business Forum](#)
- [Tuna 2020 Traceability Declaration](#)
- [Mapping of Sustainable Development Goals to human rights instruments and issues](#)