



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: Aldi Nord

Human Rights Policy

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

Yes, we published a Human Rights Policy Statement in October 2018. You can access the statement via the following link:

[ALDI North Group – Human Rights Policy Statement](#)

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

Checks to detect modern slavery throughout our supply chains and therefore our canned tuna supply chain of high-risk countries are made through our Social Compliance Programme. If the supplier's site is located in a 'high-risk' country as defined by amfori BSCI (Business Social Compliance Initiative), the supplier has to provide independent third-party audits of the production facilities to demonstrate compliance with our ethical requirements as defined in the Social Compliance Programme (e.g. amfori BSCI audit, SA8000 (Social Accountability International Standard), SMETA (Sedex Members Ethical Trade Audit)).

The ALDI North Group believes that companies should be committed to respecting human rights and preventing human rights violations. Our commitment therefore

encompasses our own business operations and business relationships, as well as impacts indirectly caused by our actions.

We respect all internationally recognised human rights. There are certain human rights aspects that are of increased relevance to us as a food retailer and vendor of non-food as our actions could have a stronger impact on these. These relate to topics such as discrimination, health and safety, freedom of association, remuneration, working hours, child labour and forced labour. We review our human rights impact, in particular our areas of focus, in cooperation with external experts. - [ALDI North Group – Human Rights Policy Statement](#)

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

The amfori BSCI Code of Conduct, which states that businesses shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, is part of all buying agreements with all of our importers. In addition, we have published several purchasing policies (including fish).

You can access the fish purchasing policy via the following link:

[ALDI North Group – Fish Purchasing Policy](#)

Human Rights Due Diligence Process

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

We require our suppliers to provide full traceability of all seafood and fishery products which they deliver to ALDI North. In this respect, we request a variety of additional information aside from the standard data, e.g. the time of catching, the vessel and the port of landing. Furthermore, the supplier shall be in a position to present the entire value chain of a product based on the item specification (batch number in connection with the relevant best-before date).

In order to make these information easily accessible to our customers, we introduced the ALDI Transparency Code (ATC) for fish in 2017. The ATC is our own product traceability

system to enable our customers to trace the origin of various products like meat, eggs, fish and textiles. Upon scanning a QR-Code on the product packaging, the user will receive online information on the product supply chain and more detailed information on the specific fishing method.

More information can be found under the following link: [ALDI Transparency Code \(ATC\)](#)

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.

We are committed to the UN Guiding Principles on Business and Human Rights (UNGPs). As such, we consider a thorough human rights due diligence process an integral part of our human rights approach.

We continually assess the impact of our actions on human rights. In particular, we set priorities and evaluate risks based on the severity of potential human right impacts. In this context, we are aware that specific groups, such as minorities and women, are potentially more vulnerable to violations of their fundamental human rights. We will continue to increase our dialogue with local stakeholders and potentially affected parties, the human rights of whom may particularly be at risk of being violated.

We strive to prevent and mitigate the impact of any risks we identify, and prioritise by implementing corresponding measures. This involves, among other things, aligning our

management and buying practices with this goal, raising awareness and training of relevant employees, our business partners, and suppliers. Wherever our potential influence is low, we participate in industry-wide and multi-stakeholder initiatives. [ALDI North Group – Human Rights Policy Statement](#)

All suppliers need to provide details of the canned tuna production facility as part of our contract requirements. If the supplier's site is located in a 'high-risk' country as defined by amfori BSCI (Business Social Compliance Initiative), the supplier has to provide independent third-party audits of the production facilities to demonstrate compliance with our ethical requirements as defined in the Social Compliance Programme (e.g. amfori BSCI audit, SA8000 (Social Accountability International Standard), SMETA (Sedex Members Ethical Trade Audit)).

Description of risk assessment and planned next steps

The ALDI North Group worked together with a third party consultancy to identify high risk and high priority commodities. Based on the risk assessment in combination with our annual spend, 8 product groups were categorized as high risk including fish and seafood. Drawing on our risk assessment we will further develop the existing due diligence process as a next step.

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.](#)

We endeavour to raise the awareness of our suppliers regarding the exclusion of merchandise from illegal, unregulated, and undocumented (IUU) fisheries. [ALDI North Group – Fish Purchasing Policy](#)

As part of this policy, we have included the requirement that for invitations to tender from 1st July 2017, the commissioned production facilities for the industrial manufacturing of canned food (including canned fish) in BSCI risk countries are subject to an additional social auditing (BSCI/SA8000). Moreover, we intend to expand our controlling procedures in a risk-oriented way.

If the product is not MSC-certified, we and our suppliers jointly strive to achieve compliance with at least one of the following criteria:

- The supplier or processing company, respectively, is a member of ISSF (International Seafood Sustainability Foundation);
- The vessel is registered with the ProActiveVessel Register (PVR);
- The fishery verifiably supports a Fishery Improvement Project (FIP) that is registered on fisheryimprovementprojects.org and thus meets the requirements of the Sustainable Fisheries Partnership (SFP).

ALDI North undertakes regular reviews of its targets in the area of sustainable fish and seafood purchasing and may, where required, formulate additional targets and measures. In doing so, we are in a constant dialogue with external partners such as NGOs, members of the academic professions and other relevant stakeholders.

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 above.

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.

Grievance mechanisms provide a suitable means of identifying adverse effects at an early stage. For this reason, we have created grievance mechanism processes for our own employees and business partners. However, as the last actor along multi-level, complex supply chains, we have identified particular challenges regarding individual implementation in countries where the products we offer are manufactured. We intend to address this task by developing concepts that improve access to grievance

mechanisms in relevant supply chains. [ALDI North Group – Human Rights Policy Statement](#)

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?

As every human rights violation (including modern slavery) is unique, we assess every case that is brought to our attention individually and develop a corresponding remediation plan. On an individual basis, multiple internal and external stakeholders, such as business partners, standard organizations and our CR office in Hong Kong, are involved to investigate and initiate remediation measures.

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)?

We have not been made aware of any particular instances of modern slavery in our tuna supply chain in 2018.

Reporting

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

We publish a Sustainability Report on a regular basis, including information on supply chain tasks and explaining what effort we have already made in the context of transparency and social compliance.

[ALDI North Group – Sustainability Report 2017](#)

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.

As mentioned before, we are part of multi-level, complex supply chains. The implementation of our human rights policy in countries where the products are manufactured is a long-term challenge.

We believe that transparency is a significant component of human rights due diligence. Therefore, we have initiated efforts to provide a greater insight into our supply chains and communicate openly about corresponding risks and the measures we take. We will also continue to increase our dialogue with local stakeholders and potentially affected parties, the human rights of whom may particularly be at risk of being violated.

14. Does the company participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing, eg:

- a) Seafood Task Force;
- b) Bali Process Government and Business Forum;
- c) Tuna 2020 Traceability Declaration; and
- d) other?

If yes, please provide details.

As a participant of the amfori BSCI and its project groups, ALDI North is actively working to improve working conditions within our global supply-chains.

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

We strongly believe that the implementation of human rights is a continuous process. We are therefore committed to review and further develop our Human Rights Statement and instruments on a regular basis.

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](#)