



# 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 Süd

## Human Rights Policy

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

Yes, the ALDI SOUTH Group made a public commitment to respect human rights:

[ALDI SOUTH Group - Human Rights](#)

[ALDI SOUTH 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.

Yes our international Human rights policy addresses modern slavery, specifically forced labour and child labour, and applies throughout our supply chains. We also address modern slavery in our ALDI GB Modern Slavery Statement and our ALDI US Website.

**The ALDI SOUTH 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 SOUTH Group - Human Rights Policy Statement](#)

**ALDI GB** operates with honesty and integrity wherever it does business around the world. We respect human rights and treat the people in our supply chain who make, grow and supply our products fairly.

The Modern Slavery statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It explains the steps taken by ALDI UK, and other relevant group companies, during the year ending 31st December 2017 to prevent modern slavery and human trafficking in its business and supply chains. - [ALDI UK - Modern Slavery Statement](#)

**ALDI US** discloses measures used to track possible slavery and human trafficking in their supply chains, which is required by the California Transparency in Supply Chains Act of 2010 (SB 657) - [ALDI US Transparency in Supply Chains Act](#).

3. [Does the company have a responsible sourcing or supplier code of conduct that prohibits modern slavery? Please provide details.](#)

For our suppliers, we are a fair and reliable business partner. Together, and in cooperation with other stakeholders, we are committed to improving the living and working conditions throughout the supply chain. We articulate our expectations clearly to all our suppliers and business partners. Together with our suppliers, we work towards increased transparency and continuous improvement within the supply chain. (...)Our “Social Standards in Production” constitute an integral part of our supplier contracts. [ALDI SOUTH Group - CR-Principles](#)

#### **ALDI Social Standards in Production**

The ALDI “Social Standards in Production” define our commitment to human rights and fair labour standards. They are based on

- the United Nations Universal Declaration of Human Rights,
- the United Nations Convention on the Rights of the Child,
- the United Nations Convention on the Elimination of All Forms of Discrimination against Women,
- the International Labour Organization (ILO) Conventions, and
- the OECD Guidelines for Multinational Enterprises. based on the ILO Standards (International Labour Organization).

We do not tolerate any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour. All disciplinary procedures must be in compliance with local laws, be established in writing, and must be explained verbally to workers in clear and understandable terms. The use of corporal punishment, mental or physical coercion, and verbal abuse is forbidden.

[ALDI SOUTH Group - Social Standards in Production](#)

## Human Rights Due Diligence Process

### 4. [Has your company mapped its tuna supply chains, in whole or part?](#)

We map our tuna supply chain as follows: all suppliers are obliged to provide information on the last production facility and we request our suppliers to assure the traceability of all fish and seafood products delivered to ALDI SOUTH Group. In this respect, we require a range of information to be provided in addition to the standard commercial specifications: This means that our suppliers are requested to report

- Common name
- Scientific name
- Production method
- FAO catchment area (wild-caught)
- Country of origin (aquaculture)
- Name of fishery or the flag of the fishing vessel and the jurisdiction (optional)
- Details about certification

Aside from this, our suppliers must also be able to provide information at all times on the entire value chain for any product delivered to ALDI SOUTH on the basis of product labelling (lot and/or batch number in connection with the respective best-before-date).

[ALDI AU - Fish and Seafood Policy](#)

[ALDI DE - Fish and Seafood Policy](#)

[HOFER - Fish and seafood policy](#)

[ALDI US - Seafood Buying Policy](#)

[ALDI UK - Fish and Seafood Policy](#)

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.

Yes, we already have measures in place that we are currently developing further according to our recently completed human rights risk assessment in food supply chains.

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 SOUTH Group - Human Rights](#)

All suppliers need to provide details of the canned tuna production facility as part of our contract requirements. If the supplier's production facility is located in a 'high-risk' country as defined by amfori BSCI, the supplier has to carry out a social audit (already implemented by HOFER, DE, AU (only for products from Thailand), US) (see also question 7 - Social Monitoring Programme)

***Description of risk assessment and planned next steps***

The ALDI SOUTH 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, selected product groups were categorized as priorities including fish and seafood. Drawing on our risk assessment we will complement the existing due diligence process as a next step. Improvement of our current process will focus on better traceability, improved integration of human rights evaluation into the buying process, supporting improvement projects in the supply chain and monitoring and reporting of the impact of our activities.

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.

(i)

**ALDI US** conducts quarterly "Slavery and Human Trafficking" Training for the Corporate Buying department.

**ALDI UK**

All Aldi Buying employees are trained on how to ensure suppliers uphold the ethical standards that we set. They work closely with our CR departments to monitor suppliers' performance and intervene if any issues are found.

Since 2015, our CR team has run a number of modern slavery training sessions for employees in our Buying department. This training includes guidance on modern slavery, including relevant questions to ask and what to look for during site visits.

All new employees with buying responsibility receive one-to-one training as part of their induction, to ensure they have a thorough understanding of ethical trade issues, including modern slavery.

We have hosted conferences with suppliers to train and educate them on ethical trade and modern slavery.

[ALDI UK - Modern Slavery Statement](#)

(ii)

**ALDI GB/IE is member of the SECLG (SEAFISH)**

Participating in this group allows us to collaborate with other retailers, food service organisations and suppliers to improve our understanding of the ethical issues impacting the seafood supply chain and contribute to collaborative efforts to improve ethical standards in the sector. - [ALDI UK - Modern Slavery Statement](#)

**ALDI GB/IE: Food Network for Ethical Trade (FNET)**

FNET is collaboration between large food suppliers and retailers that share a goal of establishing a common approach to managing ethical trade in food supply chains. At the heart of this initiative is the sharing of resources and developing best practice ways of working. - [ALDI UK - Modern Slavery Statement](#)

**ALDI US is a member of the Seafood Task Force (STF)**

STF is a multi-stakeholder initiative seeking to address illegal, unreported and unregulated (IUU) fishing in an effort to address human rights issues and marine conservational problems, which are believed to be closely interlinked in Thailand. The Task force combined knowledge and experience of its membership to address complex supply

chain issues (e.g. tuna and shrimp supply chain) that cannot be solved individually. The aim is to achieve clean seafood supply chains from vessel to retailer through driving oversight and continuous improvement across people, product, process and policy. [ALDI US - Seafood Buying Policy](#)

**(iii)/(vii)**

**ALDI SOUTH Group has a partnership with the Sustainable Fisheries Partnership (SFP)**

Through this partnership we are able to improve our fish and seafood assortment and to avoid illegal, unregulated and undocumented fishing, as well as to improve the transparency of the supply chain.

**ALDI SOUTH Germany and HOFER S/E**

ALDI SOUTH Germany endeavours to raise the awareness of our suppliers regarding the exclusion of merchandise from illegal, unregulated, and undocumented (IUU) fisheries. - [ALDI DE - Fish and Seafood Policy](#)

HOFER S/E is conducting risk assessment by the nature conservation organisation WWF to ensure the responsible sourcing of the Fish and seafood products and to avoid illegal, unregulated, and undocumented (IUU) fisheries. - [HOFER - Fish and seafood policy](#)

**ALDI US Shelf-Stable Tuna**

- All shelf stable tuna suppliers must have active membership in the **International Seafood Sustainability Foundation (ISSF)** and provide a copy (upon request) of their annual ISSF Compliance Audit Report to ALDI US.
- Suppliers are not allowed to source from vessels that allow **transshipment** at sea without observer coverage, or
- Vessels caught with **Illegal, Unregulated, and Unreported (IUU)** fishing based off of updated IUU lists published by the Regional Fishery Management Organizations (RFMO).

[ALDI US - Seafood Buying Policy](#)

**(iv)**

**Extended product labelling:**

**The ALDI SOUTH Group** enables our customers to make informed decisions, ALDI and its suppliers provide comprehensive product labelling. Thus, the following obligatory information must be specified on the labels of all products containing a relevant portion of fish or seafood components:

- General species name
- Scientific (Latin) name
- Catchment method
- FAO catchment area or country where the relevant aquaculture is based

### **HOFER/ALDI SOUTH Germany - Traceability platform for customers**

On the following pages the customer can find out the exact origin of an ever increasing number of products and who produced them. We also provide the customer with some interesting additional information about the product. The customer will find the tracking code on the product.

[HOFER Platform - check your product](#)

[ALDI SÜD - Herkunft](#)

**(v)**

### **Seafood Task Force - Responsible Recruitment Oversight working group**

**ALDI US** does participate in the Seafood Task Force Responsible Recruitment Oversight working group that is working to address the issues of debt bondage and forced labour throughout seafood supply chains and over time will contribute to professionalizing the recruitment industries by setting international standards of good practice.

**(x)**

### **Social Monitoring Programme**

All suppliers need to provide details of the canned tuna production facility as part of our contract requirements. If the supplier's production facility is located in a 'high-risk' country as defined by amfori BSCI, the supplier has to carry out a social audit (already implemented by International Buying, HOFER, DE, AU (only for products from Thailand), US).

[HOFER - Projekt2020 Social Monitoring Programme](#)

[ALDI AU - Social Monitoring Programme](#)

[ALDI IE - Social Monitoring Programme](#)

[ALDI AU - Social Monitoring Programme](#)

[ALDI US - Social Monitoring Programme](#)

### **HOFER S/E and ALDI SOUTH Germany - Traceability Audits**

Traceability audits are carried out at selected suppliers of HOFER and ALDI SOUTH Germany to check compliance with our fish and seafood policy, our social standard requirements and whether social certifications are in place. The focus is on traceability of the entire supply chain, transparency and the management system of suppliers regarding the monitoring and verification of sustainability requirements. The audits should help to spot potential risk chains and to deepen the understanding of the 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?

The ALDI SOUTH Group worked together with a third party consultancy to identify high risk and high priority commodities. For each high risk and high priority commodity group, (1) all human rights risks for each sourcing country are listed, and (2) specific risks inherent to that commodity that shall be focused/prioritized on e.g. child labour, gender are highlighted. A system to track the effectiveness of actions tackling the highlighted issues for each commodity will be developed.

For production of canned tuna in risk countries as defined by amfori BSCI, the requirement from HOFER, ALDI DE, ALDI US and ALDI AU (only for products from Thailand) is for 100% of main production facilities to be covered by a valid social audit or social certification. We will develop KPIS to track the effectiveness

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 SOUTH 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 part of the **Social Monitoring Programme requirements** for canned tuna, **ALDI** has an established policy to manage non-compliances found in audit reports as well as a policy that defines select non-compliances as “severe.” Suppliers are expected to support efforts to ensure non-compliances (minor, major) found are addressed and remediated in a Corrective Action Plan (CAP). However, if a severe risk is found (i.e. unauthorized subcontracting, payment below minimum wage, forced labor), ALDI reserves the right including, but not limited to, termination of the business relationship with the supplier.

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 report our progress to address human rights and environmental issues every two years in our [International Corporate Responsibility Report](#). The Report also includes KPIs

on Social Audits, MSC, ASC organic, GLOBALG.A.P. and BAP certifications. The KPIs will be updated every year on our Website. In the future, we will include further KPIs to report on our progress to address human rights issues in the food supply chain.

## 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.

Our main tool, social audits has limitations in detecting modern slavery. We are currently working on a strategy to complement our current measures by improving traceability and exploring approached to overcome the limitation of audit-focused approaches.

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.

### [ALDI SOUTH Group - Initiatives](#)

We are part of the following multi-stakeholder initiatives that address modern slavery in the supply chain including fishery:

- Seafood Task Force
- Amfori BSCI (international)
- Sedex Supplier Ethical Data Exchange
- Seafood Ethics Common Language Group

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

[ALDI AU - Supply chain Standards](#)

[ALDI AU - Fish and Seafood Policy](#)

[ALDI DE - Sozialstandards in der Produktion](#)

[ALDI DE - Fish and Seafood Policy](#)

[HOFER - Social Monitoring Programme](#)

[HOFER - Socialstandards](#)

[HOFER - Fish and seafood policy](#)

[ALDI US - Seafood Buying Policy](#)

[ALDI US - Supply Chain](#)

[ALDI US - Supply Chain Seafood](#)

[ALDI UK - Fish and Seafood Policy](#)

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](#)