



Canned Tuna Brands - New Companies - 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: Carrefour

Canned Tuna Brands: Albacore, Yellowfin, Skipjack

Human Rights Policy

1. [Has your company made a public commitment to respect to human rights? Yes / No](#)
If yes, please provide full details and a link.

Carrefour is committed to improving working conditions and protecting human rights and the environment among its suppliers.

The Purchasing Rules provide the framework for the social and environmental compliance of purchases of all Carrefour brand products. In other words, all products purchased by Carrefour, whether or not for retail sale, food or non-food, must meet specifications defined by Carrefour and undergo specific quality checks. Updated in 2018, they apply to all Group entities and all production countries, in line with their risk levels established during country risk mapping.

These rules stipulate:

1. that all suppliers must sign a Commitment Charter;
2. the process and compliance rules for social audits;

3. that all the Group's purchasing entities must appoint a person in charge of social and environmental compliance;
4. an action plan to bring sensitive production phases and raw materials into compliance with specific purchasing rules

To identify those countries where risk of non-compliance with the charter is highest, Carrefour has established a country-by-country risk map, which was revised in 2018 in line with the duty of care plan. The list of risk countries is based on the country-by-country risk classification defined by amfori-BSCI and on the ITUC Global Rights Index. The country classification also takes into account recommendations from the International Federation for Human Rights (FIDH) and from Carrefour's local teams. Procurement potential and purchasing rules depend on the risk rating assigned to each country.

Carrefour is putting tools and procedures in place to monitor and support its suppliers :

- The duty of care creates a direct responsibility to our Tier 1 suppliers. As a leader in the food transition, and following the spirit that inspired the Quality Lines, it is necessary to take steps to control risks on all our supply chains, in social and environmental terms. The holistic approach must be combined with a more specific approach on commodity chains for which a significant risk has been identified.
- Carrefour performs compliance audits on all supplier factories located in high-risk or risk countries. The audits are conducted under Initiative for Compliance and Sustainability (ICS) and Business Social Compliance Programme (BSCI) standards. The audit is not an end in itself but rather, a tool that paves the way for dialogue and the implementation of a compliance plan to bring the supplier's working conditions in line with requirements.
- Carrefour provides training, implements regional projects and supports fair trade to partner its suppliers and promote CSR within its supply chains. Carrefour trains its suppliers in partnership with consultants or local NGOs. Carrefour's Sourcing teams roll out specific training programmes every year. The Group has also drawn up the Good Factory Standard, a practical training document featuring a breakdown by sector and/or by type of product (bazaar, clothing, wood, leather, etc.).
- Since 2007, Carrefour has provided all of its suppliers with an online sustainable development self-assessment test, based on the ISO 26000 social responsibility standard.

For more detailed information on our initiatives , feel free to read the [2019 Universal Registration Document](#) or the [Supply Chain Management documents](#) available on our website.

2. [If yes, does your company's commitment address modern slavery and does it apply throughout your supply chains? Please provide details.](#)

Carrefour performs compliance audits among direct suppliers and requires the same level of vigilance from their part with their own suppliers.

Those audits are conducted under Initiative for Compliance and Sustainability (ICS) and Business Social Compliance Programme (BSCI) standards. Those standards include Forced/Bounded Labour, Child Labour and Decent working hours that are checked through an initial audit, a follow-up audit and a re-audit.

ICS audit standards cover elements related to modern slavery as described below:

Chapter 0 - Management system, transparency and traceability

- Existence and communication of policies set by the factory on child labour, forced labour, discrimination, disciplinary practices, harassment, abuse, freedom of association, work hours and overtime, remuneration and benefits, health and safety and anti-bribery.
- Hiring and termination terms.

Chapter 1 - Minimum age, Child labour and Young workers

- Child labour legislation and international standards.
- Employment conditions of young workers.

Chapter 2 - Forced labour

- Employees' access to their personal documents and belongings.
- Freedom of movement.
- Recruitment practices.

Chapter 4 - Disciplinary practices, harassment and abuse

- Absence of forms of harassment, mental, physical and/or verbal abuse, corporal punishment and disciplinary practices.

Chapter 5 - Freedom of association and grievance mechanisms

- Collective bargaining and unions.
- Modalities of workers representatives' meetings with factory management.
- Existence and communication of factory's grievance mechanisms.

BSCI audit standard covers the following elements :

- No bonded labour : Business partners shall not participate in any form of servitude or non-voluntary labour. They should allow their workers the right to leave work or terminate their employment provided with reasonable notice to their employer
- No child labour : The organization should establish a clear policy in employing their workers. Upon recruitment employers shall ensure the applicant is not less than 15 years of age unless the job is under the exception recognized by the ILO.
- Decent working hours : Employees are not required to work more than 48 regular hours per week, without prejudice to specific expectations. In exceptional cases defined by the international labour organization (ILO) overtime may be permitted but it should be voluntary, doesn't compromise Workplace Exposure Limits (WELs), and paid at a premium rate of not less than one and one-quarter times the regular rate.

3. [Has your company adopted a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Yes / No](#)

[If yes, please provide details.](#)

The commitment of suppliers of Carrefour-brand products to human rights is reflected first and foremost through their signature of a Supplier Commitment Charter, which is an integral part of all purchasing contracts in all Group host countries. Developed in partnership with the FIDH (Fédération Internationale des Droits de l'Homme), it was updated as part of the duty of diligence plan in 2018. It includes the provision of an ethics hotline, available 24/7 in all of the Group's languages, via the internet or by phone.

Carrefour trains its suppliers in partnership with consultants or local NGOs. Carrefour's Sourcing teams roll out specific training programmes every year. The Group has also drawn up the Good Factory Standard that applies to the most sensitive activities, a practical training document featuring a breakdown by sector and/or by type of product (bazar, clothing, wood, leather, etc.).

To keep on fighting illegal and dangerous practices in the fishing industry, Carrefour also follows the [“Professional’s guide to fight against illegal fishing”](#) also called the declaration code of conduct. This one was shaped by the British Retail Consortium, the Environmental Justice Foundation, WWF France and SeaWeb Europe, in collaboration with the Carrefour Group. It provides information on the organization of competences in the fishing sector, the EU IUU Regulation, the tools for an adapted control plan as well as recommendations you could apply to your business’ practices.

Human Rights Due Diligence Process

4. [Has your company mapped its tuna supply chains, in whole or part? Yes / No](#)

Carrefour has mapped its tuna supply chain in whole for its main european integrated countries (France, Spain, Italy and Belgium), engaging with suppliers on one hand and developing a specific procurement policy for tinned tuna on the other hand.

Indeed for each batch of tuna, each supplier must provide the following elements:

- Name and flag of catcher and transshipment vessels
- Fish species and the total weight by species
- FAO zone /Ocean of capture corresponding to tRFMO area
- Fishing trip dates
- Fishing gear employed (use of FAD or not, fishing on dolphins or mammals's shoals)
- Well storage procedure
- Fishing gear for each vessels (if specialized in Pole and line, for example),
- Date company took ownership
- Each species
- Ports and countries of landing

- Societies of transformation and shipping

In 2015, Carrefour launched a project of tuna fished using pole and line fishing techniques less harmful to biodiversity. Working alongside its stakeholders, Carrefour has developed a procurement policy for tinned tuna and assessing its supply lines based on:

- the states of different species in the various fishing zones
- the fishing technique used
- traceability is checked from the boat right up to the tin

For more information refers to the following press release:

<https://www.carrefour.com/en/newsroom/carrefour-remains-committed-promoting-sustainable-fishing-and-now-selling-tuna-fished>

Finally, Carrefour is conducting traceability tests with some of its suppliers in order to do control checks and verify their conformity.

5. Does the company source tuna from the **Pacific** region? Yes / No

If yes, provide location (by country).

The European Union Regulation to end illegal, unreported and unregulated (IUU) fishing requires that 'third countries' (those not in the EU) which export fish to the EU or lend their flags to vessels that import into the EU meet strict standards for fisheries management. If these standards are not met, the countries may be 'carded', which means that they could ultimately face exclusion of their fish from the EU market.

As Carrefour prohibits the use of boats, shipowners or transformers belonging to countries which have yellow or red cards given by the EU and prefers shipowners and flags originating from a low social risk region, its implementation in the Pacific region is quite limited. Carrefour is sourcing from one plant in Ecuador.

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? 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.

7. 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.

Examples might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;

To keep on fighting illegal and dangerous practices in the fishing industry, Carrefour follows the "Professional's guide to fight against illegal fishing" also called the declaration code of conduct. This one was shaped by the British Retail Consortium, the Environmental Justice Foundation, WWF France and SeaWeb Europe, in collaboration with the Carrefour Group. It provides information on the organization of competences in the fishing sector, the EU IUU Regulation, the tools for an adapted control plan as well as recommendations you could apply to your business' practices. In 2016, Carrefour translated this guide in French concerted with its stakeholders in order to use it as a training tool with its suppliers.

https://www.wwf.fr/sites/default/files/doc-2017-07/161129_guide_pour_lutter_contre_la_peche_illegale.pdf

- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;

Carrefour's policy has historically been established by engaging with relevant stakeholders, several panels have been organized with NGOs, fisher representatives and policy makers to structure its action plan collaboratively. Carrefour is challenging this policy in its main european integrated countries and encouraging its local BU to engage with relevant local stakeholders.

iii) *cascading contractual clauses in supply agreements;*

Within the signature of the Supplier code of conduct, Carrefour is engaging with its suppliers to cascade its human rights principles along the supply chain. Moreover on its tuna policy, Carrefour is engaging with its supplier to cascade the following criteria:

- Each ship is equipped with cameras.
- Every three weeks ships are obliged to land and unload fishes and people. The content of the ship is then verified by port authorities.
- Moreover plants in special need countries are frequently audited.

iv) *digital traceability of fish (across entire supply chain, or part only);*

Carrefour is communicating on its tuna can packaging about the following traceability criterias:

- Indicating of FAO sourcing zone
- Common and scientific species name and indication about the fishing method (in case of pole and line and without DCP)

v) *prohibition on recruitment fees;*

vi) *protective measures to protect against exploitation of migrant fishers;*

Carrefour is prohibiting forced labour in its social audit (refers to answer 1).

vii) *prohibition on sourcing from suppliers that transship at sea, or use flags of convenience;*

Refers to answer 5.

viii) *ensuring freedom of association and collective bargaining by fishers/ their representatives (including unions);*

Within the signature of the Supplier code of conduct.

ix) *oversight of recruitment or labour hire entities; and*

Carrefour is conducting traceability tests with some of its suppliers in order to control the compliance to its tuna policy.

x) independent supply chain *auditing*.

Please provide details.

8. If your 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?

As part of its due diligence plan, Carrefour has carried out a risk mapping analysis. This identifies "the environmental impact associated with production methods and selection of raw materials by direct suppliers" as one of the Group's priority risks. This risk, like the one related to the social conditions of production of Carrefour's own-brand products, is subject to mitigation measures for all of Carrefour's direct suppliers, depending on their level of risk. These measures are defined in the Group's purchasing rules for the social and environmental compliance of suppliers of controlled products.

In addition, **as part of its corporate social responsibility**, Carrefour has chosen to extend its risk analysis approach more broadly within its value chain, and particularly to sensitive raw materials and production stages. Indeed, "securing the Group's supply chain" is one of the major risks identified by Carrefour, presented in its risk universe (Chapter 4 Risk Management and Internal Control p.163 of Carrefour's universal registration document). This risk and its mitigation measures are presented in detail in the Group's Extra-Financial Performance Statement, more specifically in the section dedicated to the risk sub-factor "Responsible sourcing of raw materials" (see Carrefour.com & CSR Report: "Sourcing raw materials at risk" p.56).

Within this framework, Carrefour carries out a **risk analysis on the sensitive raw materials** used in its products. This analysis assesses the societal issues associated with each raw material based on solicitations from stakeholders (investors, rating agencies, NGOs, media, customers and public authorities) and bibliographical reviews. The importance of these issues is then cross-referenced with Carrefour's sales volumes for each raw material, this information is updated regularly. **Raw materials have thus been identified as priorities for their impact on biodiversity and working conditions** and in view of their materiality in Carrefour's supplies and are subject to specific action plans, as

is the case for fish and seafood. To implement these principles, each of the priority raw materials is subject to specific purchasing rules, implemented in all the countries where the Group operates.

Corresponding public documents :

Carrefour's vigilance plan is published annually in the company's Universal Registration Document (URD), as well as in a more comprehensive dedicated publication accessible on the Group's website: Carrefour.com & CSR Report: "Carrefour Group's duty of care".

<https://www.carrefour.com/sites/default/files/2020-08/Duty%20of%20Care%20Plan.pdf>

All the information relating to the DPEF declaration is presented in the different chapters of the Universal Registration Document (URD):

https://www.carrefour.com/sites/default/files/2020-07/Carrefour%20-%20Universal%20Registration%20Document%202019_0.pdf

Grievance Mechanism

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? 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.

Carrefour Group has deployed its own **ethics alert system** enabling employees or stakeholders who wish to alert any situation or behaviour that contradict the Group's Ethical Principles. This alert system covers all the themes of the Ethical Principles, including human rights and the environment. Confidentiality of information is guaranteed at all stages of the alert process and Carrefour undertakes to ensure that no sanctions are taken against an employee of stakeholder who has reported a breach of the Ethical Principles in good faith. The existence of this warning system is intended to enable Carrefour both to prevent serious breaches of its Ethical Principles and to take the necessary measures in the event of a proven breach. The alert system consists of a website and an outsourced telephone line, enabling Carrefour employees, suppliers or

service providers to alert, in complete confidentiality, situations or behaviours that are in contradiction with the Ethical Principles. This alert system is one of the tools promoted by both parties within the framework of the agreement signed by Carrefour with UNI Global Union. The Group's ethical principles are based on the Universal Declaration of Human Rights; the eight fundamental conventions of the ILO; the OECD Guidelines for Multinational Enterprises; the ten principles of the UN Global Compact; the UN Guidelines on Business and Human Rights and the international agreement signed with UNI Global Union.

Link to the ethics line: <http://ethique.carrefour.com/>

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?

Each alert is studied and leads to a direct discussion with suppliers. Depending on findings, an action plan can be implemented or a commercial relationship can be terminated. All action plans implemented are followed up on a regular basis.

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)
- (b) Do you know where they occurred? Please describe event(s).
- (c) How did the company respond to address the issue(s)?

In the occurrences reported by our ethical line, none were related to human rights in the fishing supply chain.

Reporting

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

If yes, please provide relevant details. This could include statements issued under the [UK](#) or [Australian](#) Modern Slavery Acts.

Carrefour reports globally on its social compliance action. These information are disclosed within the Universal Registration Document and its Duty of Care plan.

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? Yes / No

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

As a retailer we are not directly linked with upstream suppliers, our impact on human rights relies on the leverage that we have with our direct suppliers and the influence that they have to cascade the good practices along the fishing supply chain. Moreover there is a need for harmonized criterias especially on human rights, towards the companies that are supplying our direct suppliers, in order to influence the global market demand.

14. Does your company actively participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing?

If yes, please provide details.

Carrefour has close relationships with the ISSF, its Tuna policy is often consulted with them in order to improve it and be aligned with the current stakes. As part of this partnership, Carrefour is often solicited to support advocacy letters addressed to the RFMO.

Besides, Carrefour is a member of the Stakeholder advisory council of the Marine Stewardship Council. The MSC is committed to supporting fair, ethical, and responsible business practices and prohibiting slavery and human trafficking practices in all its business activities and endeavours.

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

Carrefour has taken a public commitment regarding seafood sustainability on one hand and on social compliance on the other hand. The Group regularly reports on its commitments, policies and progresses on those two issues. Carrefour introduced its responsible fishing range in 2005. In 2018 it committed to fielding the widest range of sustainably sourced fish on the market by 2022. To achieve this target, the Group has committed to sustainably sourcing 50% of its fish by 2020.

In order to ensure a wide range of sustainable seafood and aquaculture products, the Group uses the following tools:

- the Carrefour Quality Lines, selected lines that are traceable back to the boat or farm;
- the Aquaculture Stewardship Council (ASC) label for responsible aquaculture, which guarantees respect for the environment, ensures animal well-being and monitors working conditions;
- the Marine Stewardship Council (MSC) label for responsible fishing, which guarantees the commitment of fishing personnel, abstaining from overfishing and respect for the marine environment;
- the Bio label, which identifies products from environmentally friendly farms;
- the use of environmentally friendly sea fishing techniques, e.g. fishing without controversial fish aggregating devices liable to damage fish stocks.
- fishery products that have implemented a robust local improvement project (P: Fisheries Improvement Project).

As tuna is the largest fishery worldwide, Carrefour does recognize that it faces major environmental and social challenges. Therefore, a specific Carrefour policy was created on tuna and applied to the main European integrated countries (France, Spain, Italy, Belgium). A non-negligible part of those principles are linked to human rights through regulations for our vessels and plants.

To fight against illegal fishing, as part of its policy Carrefour prohibits the recourse to vessels included in the IUU fishing blacklist (Illegal, Unreported, Unregulated), suspected of illegal activities, or whose flag is that of a country subject to a warning from the European Union (yellow card). It also requires the use of vessels registered and authorized by Fisheries Management Organizations (RFMOs) and having an IMO or UVI registration number with the competent authorities. These measures allow us to maintain a certain control over the vessels used for our activity.

Carrefour also provides guidelines on tuna to fight for the respect of human rights and the respect of working conditions throughout its supply chain. Those are based on international and local human rights standards and regulations specified in particular in the main ILO conventions and the Universal Declaration of Human Rights. The main expectations are the compliance with Carrefour's social, environmental and ethical charter by its suppliers.

Corresponding public documents :

<https://www.carrefour.com/en/group/food-transition/sustainable-fishing>

[https://www.carrefour.com/sites/default/files/2020-](https://www.carrefour.com/sites/default/files/2020-07/Politique%20d%E2%80%99approvisionnement)

[07/Politique%20d%E2%80%99approvisionnement](https://www.carrefour.com/sites/default/files/2020-07/Politique%20d%E2%80%99approvisionnement)

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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? Yes / No

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

In may 2020 Carrefour co-signed the letter “**COVID-19 and Observer Coverage and Management of Tuna Fleets**” with the [Sustainable Fisheries Partnership](#) and more than 50 retailers, brands, and seafood companies calling on the United States, European Union, and approximately 45 governments to implement electronic monitoring in tuna fisheries to protect workers and ensure fishing continues to be sustainable.

Requesting that:

- The normal mandated functioning of the at-sea observer program, including during transshipments, is restored at the earliest practical date. This restoration must be done without prejudicing the health and safety of observers, crew, or their onshore co-workers, families, and wider communities. The timing of this restoration should be informed by frequent and regular reviews of the developing situation and the changing risk that COVID-19 presents to the safe and effective operation of the at-sea observer program. In the interest of transparency, these reviews should be published on the RFMO website in a timely manner.
- That each RFMO seeks to achieve the agreement of all Members to rapidly progress to having electronic monitoring as an accepted approach to providing an alternative to human observer coverage of all fleets/vessels operating within the Convention Area.
- The Secretariat seeks agreement from Members to initiate a series of virtual meetings, supported by correspondence, to progress the fully effective implementation of electronic monitoring of the vessels of all fleets fishing in the Convention Area, including during transshipment activities. This should include early agreement on an implementation timeframe and operational start date.