



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: Coles Group

Canned Tuna Brands: Coles Own Brand, Wild Tides

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.

Yes.

In March 2020, Coles updated and published the following documents: [Coles Ethical Sourcing Policy](#), [Coles Ethical Sourcing Supplier Requirements](#) and [Coles Ethical Sourcing Program Guidance](#).

As stipulated in our Ethical Sourcing Policy, the complex nature of our supply chain makes it impractical for us to monitor compliance for every supplier in our extended supply chains. However, as a company that cares deeply about the welfare of workers in all stages of our supply chains, we expect our direct suppliers to ensure our Policy and Requirements are cascaded to their own suppliers and that they monitor their performance.

- 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?

Yes.

Coles introduced its first Human Rights Strategy in March 2020. The strategy encompasses all areas of the business and the commitments to uphold human rights throughout our operations and supply chain and can be found here:

https://www.colesgroup.com.au/FormBuilder/_Resource/_module/ir5sKeTxxEOndzd h00hWJw/file/Human_Rights_Strategy.pdf

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

Yes – covered on page 2 of Coles’ publicly available Modern Slavery Statement:

https://www.colesgroup.com.au/FormBuilder/_Resource/_module/ir5sKeTxxEOndzdh00h WJw/file/Modern_Slavery_Statement.pdf

3. Since January 2019, has your company adopted or revised a responsible sourcing or **supplier code of conduct** that prohibits modern slavery?

Yes.

Updated versions are publicly available here:

https://www.colesgroup.com.au/FormBuilder/_Resource/_module/ir5sKeTxxEOndzdh00h WJw/file/Ethical_Sourcing_Policy.pdf

https://www.colesgroup.com.au/FormBuilder/_Resource/_module/ir5sKeTxxEOndzdh00h WJw/file/Coles-Ethical-Sourcing-Supplier-Requirements.pdf

Human Rights Due Diligence Process

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

Yes.

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

Yes.

All the tuna comes from the F.C.F. Fishery Co., Ltd (FCF) 'Free School Program' and is caught in the Western and Central Pacific Ocean. The vast bulk of it is caught within the area covered by the Parties to the Nauru Agreement (PNA).

PNA members are the Federated States of Micronesia, Kiribati, Marshall Islands, Nauru, Palau, Papua New Guinea, Solomon Islands and Tuvalu.

FCF trans-ship the fish from either of its bases in Fiji or Majuro in the Marshall Islands.

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

Yes.

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.

Please find the following key processes and their corresponding sections in the Coles' 2020 [Modern Slavery Statement](#)

1. Identifying risk – Pages 7-9
2. Assessing and addressing risks – Pages 10-16
3. Remediation of risks – Page 19

4. Tracking the effectiveness – Pages 16-18

With relation to communicating externally on our strategy and performance, this is covered and updated through the human rights section of our website, [found here](#).

Additional aspects are covered in the Coles sustainability report, [found here](#) and in our first [Modern Slavery Statement](#)

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.

Examples might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;
- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;
- iii) cascading *contractual* clauses in supply agreements;
- iv) digital *traceability* of fish (across entire supply chain, or part only);
- v) prohibition on *recruitment fees*;
- vi) protective measures to protect against exploitation of *migrant* fishers;
- vii) prohibition on sourcing from suppliers that *transship* at sea, or use *flags of convenience*;
- viii) ensuring *freedom of association* and collective bargaining by fishers/ their representatives (including unions);
- ix) oversight of *recruitment* or labour hire entities; and
- x) independent supply chain *auditing*.

Please provide details.

All Coles Brand Skipjack and Yellowfin canned tuna can be traced back to the approved fishing boat that caught the tuna as well as the boat that transported it to the cannery.

FCF's Tuna Sustainability Policy ([found here](#)) protects against the exploitation of migrant fishers and includes commitments to freedom of association and the prohibition of forced labour.

FCF has their program audited by Bureau Veritas. As of October 2020, they have completed about 10% of the Purse Seine fleet as part of the roll out and scoping.

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?

Please find the following key processes and their corresponding sections in the Coles' 2020 [Modern Slavery Statement](#)

1. Identifying risk – Pages 7-9
2. Assessing and addressing risks – Pages 10-16
3. Remediation of risks – Page 19
4. Tracking the effectiveness – Pages 16-18

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.

Workers within Coles' supply chains in Australia and other countries, including farms, factories and service providers, can access the Coles Wages and Conditions Hotline by phone or email.

In Australia, employees who work for a Coles supplier can call 1300 532 515 between 8am and 8pm, seven days a week to understand more about their conditions of employment or to report unfair labour practices.

For workers in the international supply chain and those where English is not a first language, we have an email facility at wageline@coles.com.au where workers can provide their telephone number, preferred language and a brief description of their concern so that any issues can be addressed by Coles or the relevant authority.

Details on how to contact Coles are available in Korean, Chinese Mandarin, Bislama, Tongan, Samoan, Tetum, Vietnamese, French, Spanish, and Malay [available here](#).

No human rights concerns have been raised through our grievance mechanism in connection to Pacific tuna sector.

Coles Grievance Mechanism is detailed in the Coles Ethical Sourcing Policy [\(available here\)](#)

FCF have a grievance procedure in their Policy

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?](#)

In May 2020 Coles introduced a revised remediation framework with practical steps to address, escalate and prevent issues relating to ethical business practices and human rights. This framework can be [found here](#).

A table of human rights related complaints received against Coles' suppliers is available [here](#) and is updated quarterly.

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)

We have not been made aware of any instances of modern slavery in our tuna supply chain in over the last three years (including 2018).

(b) Do you know where they occurred? Please describe event(s).

N/A

(c) How did the company respond to address the issue(s)?

N/A

Reporting

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

Yes.

If yes, please provide relevant details, in period since January 2019. This could include statements issued under the [UK](#) or [Australian](#) Modern Slavery Acts.

Yes, we report externally on our commitments and progress to address modern slavery via our annual Sustainability Report and on our website, and in 2020 we produced our first Modern Slavery Statement which can be [found here](#). We also participate in the annual Corporate Human Rights Benchmark, with our company scorecard published on its website. We will continue to enhance our disclosures as our Ethical Sourcing Program matures.

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

No.

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

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?

Yes.

If yes, please provide details.

Coles is signatory to the Australian Seafood Traceability Statement, an industry-led business commitment towards best practice in traceability across the seafood supply chain.

Coles also participated in the Fishing Sector Consultation and Innovation Session on 13 October 2020 run by the Bali Process Government and Business Forum. The forum facilitated the sharing of insights on key risks, priorities and innovations. It included discussion of COVID-19 and the impacts that this has had on supply chains, workers and ethical recruitment.

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

N/A

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?

We recognise that COVID-19 has impacted modern slavery risks.

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

Across our supply chain broadly:

- We have been restricted in our ability to assess and address risks in our supply chain, the main cause of this being the restriction of movement as set by the relevant governments in the areas our suppliers operate in. This has resulted in auditors not being able to discharge auditing related work and Coles team members being able to visit sites less often.
- Lack of auditor availability during the pandemic challenged suppliers' ability to obtain auditor verification to be able to close out non-conformances.
- In some instances, suppliers required longer lead times to complete their required actions given disruptions to their business operations. In addition, our in-house social compliance auditor has been unable to conduct on-site audits since late February 2020.