



# 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:** Kraft Heinz

## Human Rights Policy

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

The Kraft Heinz Company and its affiliates – which includes HJ Heinz Co Australia Limited (together Kraft Heinz) – have committed to promoting socially-responsible practices across the supply chain. We strive for safe, signified, respectful and inclusive work environments, both within our own operations and throughout our global value chain. We have several systems already in place, which include compliance with national and local laws and regulations and international labor and human rights laws.

<http://www.kraftheinzcompany.com/corporate-social-responsibility.html>

[http://www.kraftheinzcompany.com/pdf/Kraft\\_Heinz\\_Sustainable\\_PalmPolicy.pdf](http://www.kraftheinzcompany.com/pdf/Kraft_Heinz_Sustainable_PalmPolicy.pdf)

[http://www.kraftheinzcompany.com/ethics\\_and\\_compliance/supplier-guiding-principles.html](http://www.kraftheinzcompany.com/ethics_and_compliance/supplier-guiding-principles.html)

[http://www.kraftheinzcompany.com/ethics\\_and\\_compliance/pdf/English\\_Employee\\_Code\\_of\\_Conduct.pdf](http://www.kraftheinzcompany.com/ethics_and_compliance/pdf/English_Employee_Code_of_Conduct.pdf)

<http://www.kraftheinzcompany.com/ethics-compliance.html>

[http://www.kraftheinzcompany.com/pdf/Supply\\_Chain\\_Transparency\\_and\\_Labor\\_Practices\\_Disclosures\\_FINALOct16.pdf](http://www.kraftheinzcompany.com/pdf/Supply_Chain_Transparency_and_Labor_Practices_Disclosures_FINALOct16.pdf)

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

Kraft Heinz places a high value on an ethical and transparent supply chain, and we support initiatives aimed to eradicate slavery and human trafficking. We demand business partners demonstrate a clear commitment to protecting the rights of workers worldwide and do not tolerate the use of forced labor – including human trafficking and slavery.

[https://www.kraftheinzcompany.com/pdf/Supply\\_Chain\\_Transparency\\_and\\_Labor\\_Practices\\_Disclosures\\_FINALOct16.pdf](https://www.kraftheinzcompany.com/pdf/Supply_Chain_Transparency_and_Labor_Practices_Disclosures_FINALOct16.pdf)

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

Yes. As part of our work to foster relationships with suppliers who share our core values, we require any supplier with whom we have a contractual relationship to comply with a set of Supplier Guiding Principles. These Principles re-state Kraft Heinz requirements and emphasize good workplace policies that comply with local labor laws and environmental laws.

[http://kraftheinzcompany.com/ethics\\_and\\_compliance/supplier-guiding-principles.html](http://kraftheinzcompany.com/ethics_and_compliance/supplier-guiding-principles.html)

HJ Heinz Co Australia Limited is in the process of undertaking additional work related to supply chain human rights due diligence in compliance with its obligations pursuant to the Modern Slavery Act 2018.

## Human Rights Due Diligence Process

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

Yes.

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?

The Kraft Heinz Company – including HJ Heinz Co Australia Limited – is in the process of expanding its human rights policies and due diligence process. Further details will soon be available on our corporate website. At present, please refer to questions 1-3 for our current protocols.

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.

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.

Yes. Please refer to the Kraft Heinz Supplier Guiding Principles – [http://kraftheinzcompany.com/ethics\\_and\\_compliance/supplier-guiding-principles.html](http://kraftheinzcompany.com/ethics_and_compliance/supplier-guiding-principles.html) and check back for further guidelines which we will post soon.

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?
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.

To help employees, suppliers and other partners report potential misconduct or human rights concerns, we have a confidential Ethics & Compliance Hotline. This Hotline has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers or online. We do not tolerate retaliation associated with potential misconduct claims made in good faith.

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?

Yes. As stated in the Supplier Guiding Principles – [http://kraftheinzcompany.com/ethics\\_and\\_compliance/supplier-guiding-principles.html](http://kraftheinzcompany.com/ethics_and_compliance/supplier-guiding-principles.html) – when Kraft Heinz becomes aware of any actions or conditions not in compliance with these Principles, such actions or conditions will be reviewed and appropriate corrective measures will be implemented. These measures are dependent on the nature of the incident.

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)?

N/A

## Reporting

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

Kraft Heinz issues a corporate social responsibility report biennially, and such details are included. Further details of our expanded efforts will be included in the 2019 Report, expected to be published on our corporate website later this year.

## 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.

N/A

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.

No.

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

N/A

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](#)