



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: REWE Group

Canned Tuna Brands: REWE "Beste Wahl", REWE "Ja!", PENNY "Berida", PENNY "Penny."

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, the REWE Group has published the "Grundsatzerklärung Menschenrechte"
(LINK: <https://www.rewe-group.com/dam/de/nachhaltigkeit/leitliniendownloads/leitlinien/grundsatzerklaerung-menschenrechte>).

The REWE Group is therefore committed to strengthen human rights and prevent human rights violations. The REWE Group continuously analyses where the risks for human rights violations in its supply chains are. On the one hand, the analyses are based on risk and hot spot analyses conducted for the REWE Group. On the other hand, the REWE Group reviews the effects of its actions on human rights in cooperation with external experts. The REWE Group has identified child and forced labor, income, working hours, discrimination, freedom of association and occupational health and safety as focus topics.

The “Grundsatzerklärung Menschenrechte” includes following internationally applicable standards and guidelines:

- the Universal Declaration of Human Rights of the United Nations (UN);
- the United Nations Guiding Principles for Business and Human Rights (UNGPs);
- conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards;
- the principles of the United Nations Global Compact (UNGC);
- the UN Convention on the Rights of the Child;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and
- the Forced Labour Priority Principles of the Consumer Good Forum (CGF).

The REWE Group has published the Guideline on Fairness (LINK:

<https://www.rewegroup.com/dam/de/nachhaltigkeit/leitlinien-downloads/leitlinien/guideline-fairness>)

The scope of the guideline covers all supply chains for the private labels of REWE Group, which are sold in Germany by REWE, PENNY and toom Baumarkt DIY stores. The present guideline defines a binding framework for action for REWE Group and the business relationships with contractual partners. Defined requirements and targets are consistently reviewed, and new measures and targets are agreed as required. In addition, the guideline is updated on the basis of current trends and developments.

REWE Group aligns its actions with the following internationally applicable standards and guidelines:

- the Universal Declaration of Human Rights of the United Nations (UN);
- the United Nations Guiding Principles for Business and Human Rights (UNGPs);
- conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards;

- the principles of the United Nations Global Compact (UNGC);
- the UN Convention on the Rights of the Child;
- the UN Convention on the Elimination of All Forms of Discrimination against Women;
- the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and
- the Forced Labour Priority Principles of the Consumer Good Forum (CGF).

The REWE Group has published the guideline for the prevention of child labour (LINK: <https://www.rewe-group.com/dam/de/nachhaltigkeit/leitlinien-downloads/leitlinien/guideline-prevention-child-labour>)

In the guideline, REWE Group specifies its requirements and measures focusing on preventing and eliminating child labour (incl. worst forms of child labour like forced labour) while defining a binding framework for business partners. It is therefore part of REWE Group's comprehensive fairness strategy and based on the requirements of previous guidelines. The scope of the guideline covers all private labels of REWE Group, which are sold in Germany by REWE, PENNY and toom Baumarkt DIY stores.

Based on this guideline, REWE Group has also created a toolkit to support its business partners and production sites in implementing the requirements for preventing and combating child labour.

- 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?

The REWE Group updated the guideline on fish (LINK: <https://www.rewe-group.com/dam/de/nachhaltigkeit/leitlinien-downloads/leitlinien/guideline-fish>).

The updated version includes REWE Group's goal to ensure human rights are respected and that fundamental social and occupational health and safety

standards are adhered to throughout the entire supply chain. It also defines requirements for purchasing tuna products.

The REWE Group has also published its Sustainability Report 2019 including detailed information on human and labour rights. (<https://rewe-group-nachhaltigkeitsbericht.de/2019/en/gri-report/greenproducts/gri-412-414-social-standards-in-the-supply-chain.html>)

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

Yes, they apply to all of REWE Group's supply chains. The "Grundsatzerklärung Menschenrechte" for example has been signed by all members of the REWE Group Board. Both the guideline on Fairness and Prevention of Child labour are guidelines covering all our private label supply chains, as defined in the scope of the guidelines. The guideline on fish covers all relevant fish supply chains (see scope of the guideline).

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

There has been no update, the Guideline for sustainable business practices is still valid. (<https://www.rewe-group.com/dam/jcr:a6c0d33c-84cb-4cf5-8576-04aa82e6c83c/guidelinesustainable-business-practices.pdf>)

Human Rights Due Diligence Process

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

REWE Group generally demands complete traceability for raw materials both for wild caught fish and for fish from aquaculture, all suppliers have to provide information on the last production site. REWE Group offers its customers uniform and detailed product labelling on the packaging.

The following legally prescribed information is required:

- Name of species of fish /seafood in German

- Scientific name in Latin
- Fishing area (FAO) /country of origin
- Fishing method

In addition to the legally prescribed information, REWE Group offers its customers further information on many products by means of various traceability instruments: Wild caught fish

- Country of origin
- Fishing boat / fleet
- Fishing period
- Port of landing
- Date of processing
- Factory production

Aquaculture

- Aquaculture farm
- Type of farming
- Fishing date
- Date of processing
- Factory production

REWE Group also requires its suppliers to be able to disclose their entire supply chain upon request. Based on the information we can map our tuna supply chain.

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

Yes, the REWE Group sources from FAO 77, 71, 81 and 87

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, see Guideline on Fairness Section II.

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.

See also Section II of the guideline on fairness and the sustainability report (<https://rewe-groupnachhaltigkeitsbericht.de/2019/en/gri-report/green-products/gri-412-414-social-standards-in-the-supply-chain.html>)

- i) The REWE Group has had conducted a Modern Slavery Risk Analysis by an external organisation (including a case study on Seafood). The analysis followed a three step approach.

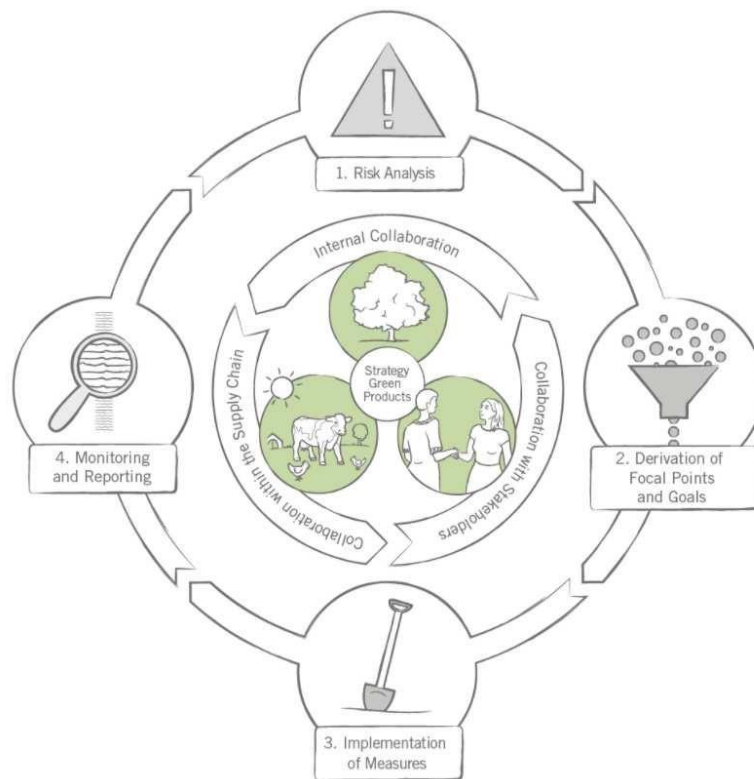
Phase 1: Country risk assessment

Phase 2: Commodity risk assessment and Combining country & commodity risk

Phase 3: Program Recommendations & Case Studies

- ii) The REWE Group is developing a guideline on forced labour.

- iii) The REWE Group is conducting audits and trainings in relevant factories and with strategic suppliers. The REWE Group has an internal strategy process to check its measures and actions.



- iv) The REWE Group is communicating how it is addressing its human rights impacts in different external documents such as the Sustainability Report and the Guideline on Fairness.

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;

The REWE Group has a compliance training which is compulsory for all employees, incl. procurement.

Moreover, the REWE Group is working to further integrate sustainable procurement into its purchasing processes so as to ensure that sustainability

considerations are taken into account in every purchasing decision. REWE Group raises awareness internally by providing risk analyses and briefings, coordinating binding targets with purchasing departments and carrying out training on sustainability issues.

REWE Group staff receive regular training on relevant labour and social standards issues to ensure that defined standards, such as compulsory social audits, are considered accordingly in supplier selection and in the purchasing process. Internal reports enable continuous development within the area of action of people. External communication creates transparency vis-à-vis stakeholders.

There are meetings with all relevant management staff for fish products to raise awareness for sustainability issues such as labour rights on fishing vessels. Furthermore, strategies and measures to address the issues are discussed. Based on the results of the management meetings, the procurement teams will be involved to implement the strategies and measures at an operational level.

Once a year, the REWE Group sustainability strategy is discussed with the board to raise awareness and develop the strategy.

The integration of sustainability into the procurement processes has also been communicated externally through an interview -only in German - <https://magazin.rewegroup.com/menschenrechte/nachhaltigkeit-im-einkauf>

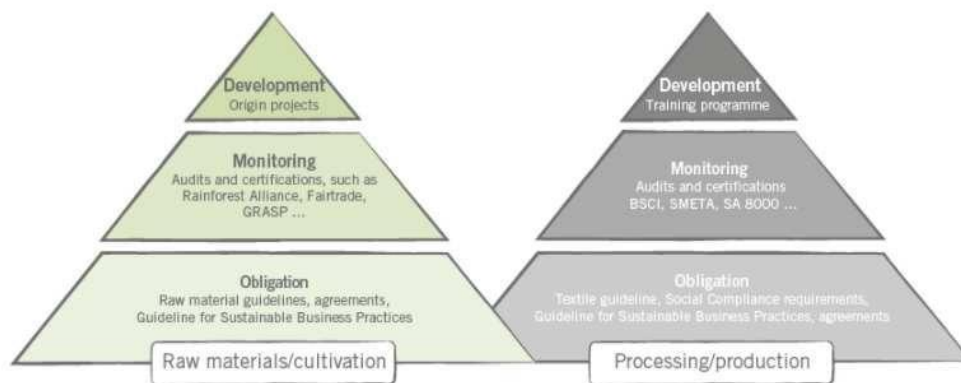
ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;

The REWE Group has been in dialogue with GIZ, Fairtrade and MSC. Moreover, the REWE Group is in intensive exchange with ministries regarding the German “Lieferkettengesetz”. The REWE Group has also published a statement where it is calling for “an international solution that is binding for all players”.

The REWE Group has held a fairness dialogue with important stakeholders incl. NGOs, Standard organisations and experts.

iii) *cascading contractual clauses* in supply agreements;

As described in the sustainability report (<https://rewe-group-nachhaltigkeitsbericht.de/2019/en/gri-report/green-products/gri-412-414-socialstandards-in-the-supply-chain.html>), in its supply chain management, REWE Group takes a three-prong approach with regard to the area of action of people, which includes formulation of requirements, monitoring and developing the suppliers and supply chains:



All business partners in REWE Group store brand supply chains are required to state the production sites where products are manufactured for REWE Group. Raising awareness and binding contract partners are part of a concrete framework for implementing sustainability throughout the supply chain. The REWE Group sustainability department verifies adherence with requirements in the purchasing process. E.g., the REWE Group requires from all its suppliers from risk countries (based on the amfori list) to provide proof of a valid social audit (BSCI, SA 8000, SMETA).

REWE Group business partners are obliged to comply with minimum requirements, such as international and national laws and the core labour standards of the International Labour Organization (ILO). This involves obligation to adhere to the following principles in particular:

- Any form of discrimination is prohibited. Business partners undertake not to exclude or favour individuals for any reason, including their gender and ethnicity.

- All companies in the supply chain must pay their staff the national minimum wage or a greater amount regularly (at least monthly).
- Business partners must ensure that working hours are in compliance with applicable national laws and industry standards.
- Business partners must comply with health and safety regulations under national laws and international standards.
- All business partners must allow workers to exercise their rights of freedom of association and collective bargaining.
- Business partners must ensure that no children work in their companies.
- Business partners must ensure fair and respectful treatment of workers.
- Business partners must ensure that forced or compulsory labour and human trafficking do not take place in any form.

At supplier events and in individual discussions with suppliers, REWE Group is constantly raising awareness of issues regarding human rights and working conditions.

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

The REWE Group has an own traceability tool for its fish products. Consumers can access the information through a tracking code. The aim is to have a tracking code on all fish products (mono products).

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);*

Ensuring freedom of association is, as described above, one of the key issues identified by the REWE Group. As the Guideline on Fairness and the “Grundsatzklärung Menschenrechte” (both are based on internationally applicable standards and guidelines) covering all supply chains, they also apply to seafood supply chains.

- ix) oversight of *recruitment* or labour hire entities; and
- x) *independent supply chain auditing*.

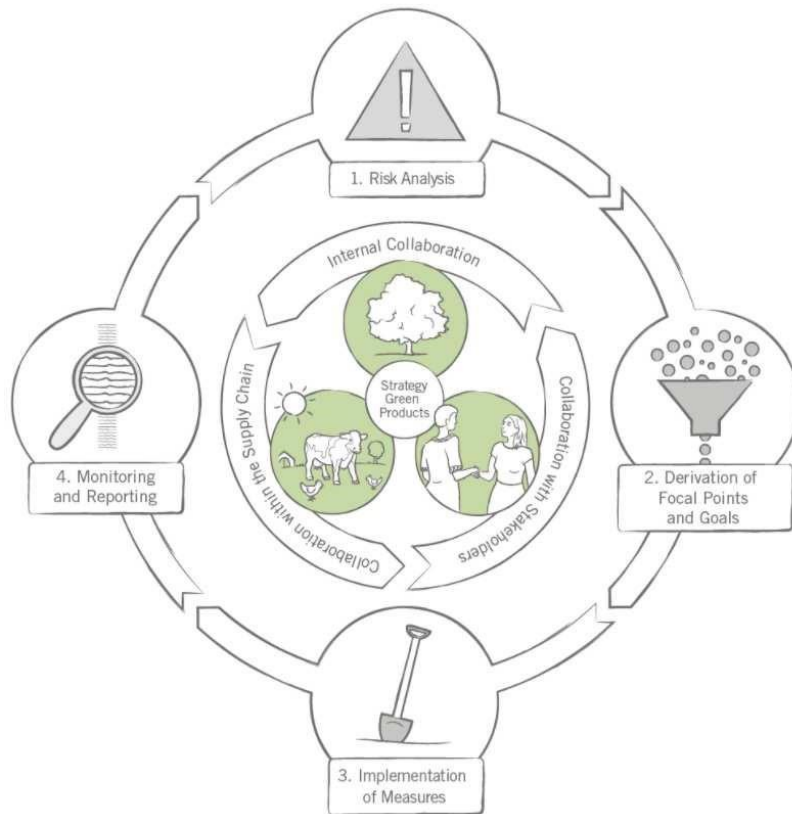
Partly due to persistent pressure by the REWE Group, the MSC certification now also requires proof of social audits for onshore operations. The REWE Group will continue to work with the MSC to include requirements for operation at sea.

The REWE Group requires all suppliers from risk countries (Based on amfori list) to provide proof of a valid social audit (BSCI, SA 8000, SMETA)

Please provide details.

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 REWE Group has developed a process to manage risks in supply chains (see Section II in the Guideline on Fairness).



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.

In 2017, REWE Group conducted a study on the further development of grievance mechanisms in its supply chains. The results revealed that internal and external grievance mechanisms already exist in many areas of the supply chain. For example, amfori BSCI checks the existence of internal grievance mechanisms during audits. Many raw material standards also rely on internal and/or external grievance mechanisms. Grievance mechanisms in connection with auditing systems have advantages and disadvantages.

The advantage is that auditors are already on site and can check the awareness and functioning of mechanisms. On the other hand, grievance mechanisms of standard organisations may not reach workers or may be perceived as not trustworthy. In some cases, however, the grievance mechanisms provided by standard organisations do not meet the effectiveness criteria. For this reason, REWE Group focuses on advancing these mechanisms and works closely with organisations and standards. At the same time, internal processes are being further developed to determine how grievances should be dealt with and what remedy measures should be taken.

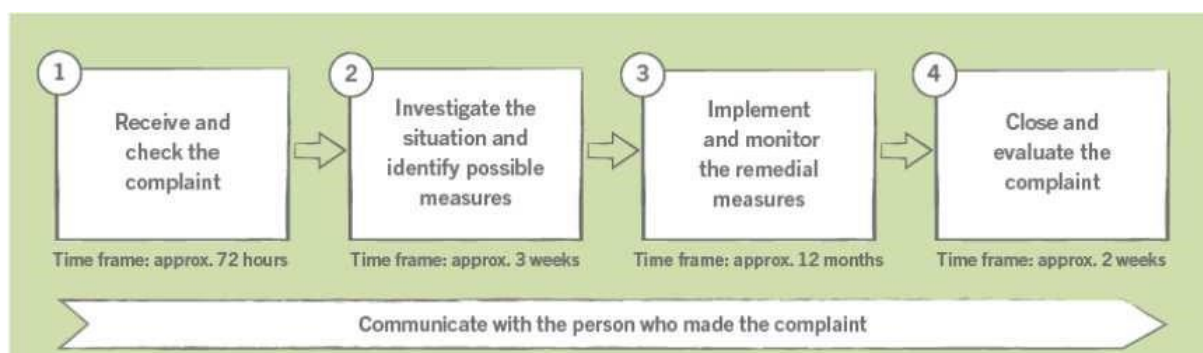
(For more information see Section 2.3.2 in the Guideline on Fairness).

REWE Group has set itself the objective of establishing a grievance mechanism system for relevant supply chains by 2025.

There have been no complaints directed at the REWE Group from the tuna supply chain.

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?

The following process has been developed by the REWE Group (see sustainability report 2019: <https://rewe-group-nachhaltigkeitsbericht.de/2019/en/gri-report/green-products/gri-412-414social-standards-in-the-supply-chain.html>).



1. Receive and check the complaint

When the complaint is received, it is documented and its reliability is examined; relevant contact persons in REWE Group are notified.

2. Investigate the situation and identify possible measures

The complaint is then investigated – for example by meeting with the supplier, industry initiative or NGOs, through on-site visits or in the form of interviews with those affected. Effective measures are then defined on the basis of the results.

3. Implement and monitor the remedial measures

The supplier or production facility concerned must implement the defined measures, such as stopping the behaviour that was criticised, preventive actions through training courses or compensation for the persons concerned. REWE Group checks consistently that the measures have been implemented – if they are not, the supplier may not receive any orders in the future.

4. Close and evaluate the complaint

If countermeasures were successfully implemented, the complaint is closed.

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) 0
- (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, as described above, the REWE Group is communicating about its human rights measures, processes and strategies in different external documents such as the Sustainability Report, press releases and different guidelines. For details and examples see above mentioned documents and an exemplary press release: <https://www.rewe-group.com/en/newsroom/press-releases/1703-humanrights-are-non-negotiable>

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

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

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?

If yes, please provide details.

We are member of the CGF and following the Priority Principles regarding forced labour.

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

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?

As the REWE Group has global supply chains, they have been affected by Covid-19. Auditors were not always able to travel to the destinations or enter factories. Certificates (e.g. MSC) will be renewed as soon as possible.

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