



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: REWE Group

Human Rights Policy

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

https://www.rewe-group.com/dam/jcr:0debad18-9304-4e63-ab0b-5183f4717bd8/REWE_Leitlinien_Nachh_Wirtsch_engl_Online.pdf

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

See section II (1-7) of the document stated in question above.

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

https://www.rewe-group.com/dam/de/presse/leitlinien/Fischleitlinie/Fisch_Richtlinie_Englisch_A4_Versand_zur_Ansicht

Human Rights Due Diligence Process

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

We have mapped our tuna supply chains in parts and we provide a traceability tool (tracking code) for consumers.

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?

We initiated a forced labour risk analysis.

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.

The analysis focuses primarily on identifying and assessing human rights impacts. Based on the findings, actions will be taken and communicated.

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.

We are working with analysis tools which indicate the sustainability of fisheries, Human rights risks, etc. for fish and seafood procurement.

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?

We will use the forced labour risk analysis (see question 6) to prioritise the risks.

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.

We are working on a grievance mechanism.

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?

In the case of deliberate gross disregard of the values described in the Guideline, the REWE Group reserves the right to impose sanctions or break off the business relationship.

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)?

None.

Reporting

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

We have an annual sustainability report (<https://rewe-group-nachhaltigkeitsbericht.de/2017/en/mainpage/index>). We are also updating our Fish Guideline which will address forced labour.

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.

We aim to engage in multi-stakeholder initiatives to influence fishing companies and their practices on board and in their hiring processes.

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.

Evaluation is in process.

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

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

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](#)