



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: Woolworths Group

Canned Tuna Brands: Woolworths (W) Branded and Essentials

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 February 2019 we launched [Requirements for Labour Providers in our Australian Horticulture Supply Chain](#).

- 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, in June 2020 we updated our Responsible Sourcing Policy. Enhancements include:

- Explicit endorsement of the UN Guiding Principles on Business and Human Rights
- Acknowledgement of our human rights governance via the Board Sustainability Committee

- Further emphasis on the expectation for suppliers to cascade requirements into their own supply base
- Recognition of our internal responsibility (e.g. Responsible Purchasing Practices) as a vital factor in promoting respect for human rights in the supply chain.

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

Yes, in August 2020, we articulated a number of commitments in our first [Modern Slavery Statement](#). Forward looking commitments are summarised on page 27.

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

Yes, in June 2019, we updated our Responsible Sourcing Standards. Enhancements included:

- further detail regarding our verification and audit framework
- clarification on the role of our guidance notes
- recognition of our extended Supplier Speak Up program for management of grievances

Human Rights Due Diligence Process

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

Yes, in alignment with our new [Seafood Sourcing Policy](#), we are able to map our tuna supply chain from fishing vessel to store. We have actively done so for “first productions” of tuna sourced according to our updated sourcing policy throughout 2019 and 2020. We will continue to conduct desk-based reviews at regular intervals going forward.

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

Yes, Woolworths currently sources yellowfin tuna and skipjack tuna from the Pacific region - predominantly FAO 71.

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

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.

Yes, in the financial year 2020 (July 2019-June 2020) we conducted a specific forced labour risk assessment of food suppliers. The food assessment examined risks associated with both products and ingredients. We combined commodity risk scores with our supplier segmentation data from our Responsible Sourcing Program to evaluate the risks of forced labour based on the commodity/country relationships within our supply chain.

The methodology looks at:

- Country risk: based on external data and aggregated insights from ELEVATE's audit data
- Commodity risk: the level of inherent human rights risks involved in producing a commodity
- Export value: incorporates the export value of commodities by country, which helps identify the likelihood of us sourcing from a country
- Supply chain information: countries we are actively sourcing from are weighted higher because they are part of our current supply chain.

Seafood was identified as our top modern slavery risk in the food category. In F21 we will use these results to prioritise suppliers for further due diligence. This will include layering in leverage data to better understand the dollar amount sourced and total number of

suppliers by country to correlate product risks with our supply chain.

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.

Yes, our updated tuna procurement policy stipulates that raw material must come from MSC certified fisheries with full chain-of-custody or in the absence of MSC sourced options from suppliers that;

- Are [participating companies](#) in the International Seafood Sustainability Foundation (ISSF) via participating membership of the International Seafood Sustainability Association (ISSA);
- With no 'major' non-conformities identified in their [annual audit report](#);
- That source only from vessels listed on the ISSF [Proactive Vessel Register](#) (PVR)

All canned tuna products currently offered by Woolworths follow the 'ISSF' pathway above and therefore incorporate enhanced measures to minimise the occurrence of modern slavery, by requiring 100% observer coverage, for example.

Further to this our team members responsible for the tuna category have completed a module on Responsible Purchasing Practices.

Offshore (excluding NZ) seafood manufacturing sites that are direct suppliers of Woolworths' branded tuna are independently audited.

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 see pages 14-17 of our [Modern Slavery Statement](#) for information on risk methodology and outcomes. On page 26 you can find information on how we assess the effectiveness of actions.

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 2019 we delivered on our ambition to provide our Supplier Speak Up service to workers in our global supply chain. The following assets are translated into key languages of migrant workers including Mandarin, Malay, Thai, Bengali, Korean, Arabic and Hindi.

- [Supplier Speak Up Policy](#)
- [Supplier Speak Up website](#)

- [Supplier Speak Up Posters](#) (example shown for Australia). Posters are presented in the national language of the operating country with key messages translated into the main languages of migrant worker cohorts.

We have further focused on building the capacity of our suppliers to develop an effective operational level grievance mechanism. Supporting material is available [here](#).

No concerns connected to the Pacific tuna sector have been reported.

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?](#)

We are developing specific remediation plans for non-compliances that could be considered *potential indicators* of modern slavery. The first of these on [Addressing Overtime Hours](#) was published in June 2020.

Guidance on remediating issues of child labour is outlined on page 10 of our [Responsible Sourcing Standards](#).

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?](#)

No instances relating to tuna procurement from the Pacific have been identified.

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)?

Reporting

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

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, in August 2020 we published our first Modern Slavery Statement to meet the requirements of the Australian Modern Slavery Act. It is available [here](#).

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.

N/A

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 have maintained previously disclosed partnerships.

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?

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

The impacts of COVID-19 on our human rights and modern slavery work can be found on pages 24-25 of our [Modern Slavery Statement](#).