



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: Woolworths Group

Human Rights Policy

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

https://www.woolworthsgroup.com.au/page/community-and-responsibility/group-responsibility/partners/Labour_Practices_in_our_global_supply_chain/

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

Yes, Woolworths Group's Responsible Sourcing Standards addresses forms of exploitation that are considered under the umbrella term 'modern slavery'. This includes "all forms of forced labour, including but not limited to bonded, indentured, prison, or involuntary labour" and child labour ([WoW Standards](#) pg. 11 and 9). Further, Woolworths Group was supportive of the establishment of an Australian Modern Slavery Act (see here).

This commitment applies throughout the supply chain: "We expect that our suppliers and our suppliers' suppliers (our upstream supply chain) are committed to the same standards as we are... We expect our suppliers to share these Responsible Sourcing Standards with their suppliers so that our expectations and standards are known and implemented at multiple supplier tiers" ([WoW Standards](#) pg. 3).

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

Yes, as per the Responsible Sourcing Standards cited above. Key modern slavery indicators addressed the Standards include:

- 5.2: Suppliers conduct own due diligence on third-party recruitment partners or agencies to ensure that worker recruitment practices are aligned with their recruitment policy.
- 5.3: Workers are not indebted or coerced to work. No workers should pay to work.
- 5.4: Workers are not required to leave deposits or identity papers (e.g. passports, visas) or bank cards with their employers.
- 5.5: Employment contracts are to be signed with a signed copy provided to each worker for their records.
- 5.7: Employment contracts shall comply with applicable local laws and international standards and are written in a language that the worker understands. Employment contracts shall contain but are not limited to information on: scope of work, wage, benefits, leave, working hours, overtime, disciplinary and grievance mechanism.
- 6.1: Suppliers maintain a written hiring policy and age verification procedure in place for the recruitment of all workers, both full-time and part-time or temporary.
- 6.5: Young workers (who are under the age of 18 and above the legal minimum working age) shall not engage with any night work in accordance to ILO Convention 090.
- 7.1: Suppliers have a written policy prohibiting all forms of forced labour, including but not limited to bonded, indentured, prison, or involuntary labour.
- 7.3: Employment is freely chosen. All workers shall have the right to enter into or terminate their employment freely without fear of retaliation, threat of physical or mental coercion, or face unlawful notice periods.
- 7.4: All overtime work shall be voluntary. Suppliers shall ensure that workers have the right to refuse overtime work without fear of retaliation or disciplinary actions.
- 7.5: Workers shall not be forced to work by a family member, associate, or friend for any reason.

- 7.7. Suppliers shall not subject, bind, or encourage workers to employment as a condition of fulfilling terms of debt to a third party or to the employers themselves. Personal loans to workers under circumstances where repayment terms suggest debt bondage or forced labour is strictly prohibited.
- 7.8. Workers have the freedom of leaving the workplace premise at the end of their working shifts. If entrances are guarded for safety reasons, workers shall have free access at all times.
- 7.9. Workers have the freedom of movement during working shifts to take designated breaks (e.g. bathroom, drinking water, etc.) and/or under exceptional cases where they need to take personal leave for family emergencies or illnesses, without fear of retaliation or disciplinary action.
- 7.10. Workers shall not be forcibly required to live in employer-owned or -controlled housing arrangements. For workers who live employer-owned or -controlled housing facilities, the freedom of movement shall not be unreasonably restricted.
- 10.1. Suppliers respect the right of all workers to freedom of association and collective bargaining. No workers shall be subjected to harassment, intimidation, or retaliation in their efforts to associate or bargain collectively.
- 11.1. Suppliers maintain and provide multiple grievance mechanisms (e.g. confidential suggestion boxes, hotlines, email, worker committees, designated space for worker meetings, meetings between management and worker representatives, etc.) as a way to provide confidential means for workers to raise grievances.
- 12.4. All workers shall be provided with written information in a language they understand about their employment conditions including wages, incentive systems, compensation and benefits, and bonuses to which all workers are entitled to under applicable law. [L]
[SEP]13.5. Suppliers have management systems in place to monitor, determine and remediate excessive working hours to demonstrate management and control of working hours. [L]
[SEP]17.3. Suppliers ensure that there were no deposits or other charges paid or services provided by workers either for their jobs or to cover other fees at the site or at their place of origin, including fees levied during termination.

Human Rights Due Diligence Process

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

Yes, Woolworths has mapped its tuna supply chains in part, in order to validate on pack claims related to the use of pole-and-line fishing methods.

5. Does the company source tuna from the **Pacific** region?

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

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?

Yes.

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.

Our overall framework for managing human rights risks in our supply chain is described on the Woolworths Group [website](#):

While our operations and supply chains are complex, our aim is to ensure that human rights are respected and understood. At Woolworths Group, responsible sourcing is not about auditing all suppliers in scope of the Standards; it is about taking a targeted and informed approach in sectors where there are known risks and where we have limited visibility. To this end, we will conduct an annual supplier risk assessment. This assessment is based on a number of factors including country risk, third-party social compliance data and the nature of the supplier arrangement.

Based on this assessment, suppliers will be categorised into four risk segments and this segmentation will determine the activities suppliers are required to complete in order to verify compliance with the Standards.

These include, but are not limited to:

- Attending training and education sessions
- Completing a supplier self -assessment questionnaire (SAQ)
- Submitting an audit under our third-party social compliance 'Mutual Recognition' scheme
- Agreeing to and implementing a corrective action plan
- Demonstrating continuous improvement
- Announced and unannounced factory or site visits.

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.

Like all own brand suppliers, supplier's in our tuna supply chain are required to comply with Woolworths's Responsible Sourcing Standards, which includes identifying and eliminating modern slavery (cf. response to question 3). As part of the new program rollout, we conducted a one day introduction and training session on Responsible Sourcing across main sourcing countries, including Thailand. Seafood suppliers, including tuna suppliers, attended this session.

Tuna suppliers fall within our higher risk segmentations for responsible sourcing and, as such, must submit an annual social compliance audit that meets the requirements of our mutual recognition program.

Compliance with Woolworths' Group's Responsible Sourcing Policy is a requirement for supplying goods to Woolworths in accordance with Woolworths' Vendor Trading Terms. According to Woolworths' Vendor Trading Terms, suppliers are required to comply with Woolworths' policies set out on our supplier portal, [Wowlink](#). The Responsible Sourcing Policy is publicly available on Wowlink.

As we continue to refine our approach to modern slavery risks, we will look to develop commodity specific strategies, including for seafood.

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?
1. We partner with the social compliance firm, Elevate, to conduct an annual responsible sourcing risk assessment. This assessment enables the business to prioritise action on human rights risk based on a number of indicators. You can read our risk methodology [here](#).
 2. We track supplier compliance via our supply chain due diligence process, including social compliance audits and corrective action plans and site visits in higher risk categories. Where multiple serious risks have been identified, we work with the site and external provider to deliver factory capacity development and improvement plans. This is a three-way engagement between Woolworths, the supplier and third party provider.

As our Responsible Sourcing Program matures, we will continue to explore options to better improve our assessment of effectiveness, including via worker engagement and worker sentiment surveys.

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.

As per our Responsible Sourcing Standard "Woolworths provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed

to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.”

Woolworth’s Supplier SpeakUp service will re-launch in February 2019 with the aim to improve the accessibility and effectiveness for workers in our global supply chain. This includes a new telephone line in Thailand with the opportunity to report in 5 languages (Thai, Burmese, English, Bahasa and Khmer) as well as a new website and intake form also in these languages. Further, in 2019 we will conduct a review of best practice grievance processes in high risk sectors to inform our ongoing work in this area.

The Responsible Sourcing Standards outlines our expectations for suppliers to maintain an effective operational level grievance. This includes a guidance note within the Standards on the eight characteristics of an effective grievance process outlined by the UNGPs (WoW Standards pg. 14). We will build on this work with more comprehensive supplier guidance and training on effective grievance mechanisms.

You can read more about our grievance and investigation procedures [here](#).

To date, we have not received any human rights concerns connected with the Pacific tuna sector.

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 described in this document [here](#).

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)?

We are yet to identify instances of modern slavery in our tuna supply chain, however, we recognise that this is a high risk area.

Reporting

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

Yes, we communicate our commitments and progress on responsible sourcing via our [website](#), and annual [Sustainability Report](#). We also participate in the Corporate Human Rights Benchmark, which makes public our [company scorecard](#).

Under the Australian Modern Slavery Act, we will make our first Modern Slavery Statement in 2020 and we will continue to enhance our disclosure as our Responsible Sourcing Program matures.

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.

As our re-launched Responsible Sourcing Program is still in its infancy, our priorities for the first year are building a baseline of suppliers' social compliance data and establishing best practice systems. Once these foundations established, we will be better placed to conduct and contribute to sector / commodity specific human rights interventions.

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.

We are signatories to the Australian Traceability Statement and have joined the Global Dialogue on Seafood Traceability. Woolworths Group was a participant in the Bali Process Business Forum and attended the Sydney Working Group in May 2018, providing insights particularly into labour hire and overseas migrant workers in Australia. We have endorsed the Tuna 2020 Traceability Declaration and in November 2018 announced a partnership with WWF Australia that includes enhanced traceability and sustainable production (see press release [here](#)).

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

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](#)