



# 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:** Century Pacific Food

## Human Rights Policy

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

Yes, our 2017 Annual Report discloses the Company's Code of Business Conduct and Ethics which covers the fundamental principles of our Employment & Labor Laws & Policies.

These principles include, among others:

1. All workers are treated with respect and dignity
2. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance
3. Work is conducted on a voluntary basis with no forced or compulsory labor
4. Healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it

A copy of our 2017 Annual Report can be found here:

<https://www.centurypacific.com.ph/webinvestor.php?d=cD02JnBjPTAmYmQ9MTk5&cat=presentation>

Moreover, part of our Tuna 2020 Traceability Declaration is a pledge to "eliminate any form of slavery", as well as a commitment to "meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights

and the International Labor Organization's Conventions and Recommendations" all throughout the Tuna Supply Chain.

A copy of our Tuna 2020 Traceability Declaration can be found here:

<https://www.centurypacific.com.ph/articlepdf/Tuna%202020%20Traceability%20Declaration.pdf>

Finally, we have also adapted Policy Statement on Human Rights which can be found on here:

[https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF\\_Policy%20Statement%20on%20Human%20Rights.pdf](https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF_Policy%20Statement%20on%20Human%20Rights.pdf)

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

Yes, as discussed in item 1 above, the Company's commitment via the fundamental principles of our Employment & Labor Laws & Policies address modern slavery by indicating that:

1. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance
2. Work is conducted on a voluntary basis with no forced or compulsory labor

Further, as discussed as well in item 1 above, this commitment extends to the rest of the supply chain as part of our Tuna 2020 Traceability Declaration's "Commitment to a Socially Responsible Tuna Supply Chain. This includes a pledge to "ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labor Organization's Conventions and Recommendations."

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

Similar to item 1 and 2 above, this is covered by our Tuna 2020 Traceability Declaration's "Commitment to a Socially Responsible Tuna Supply Chain. This includes a pledge to

“ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labor Organization’s Conventions and Recommendations.”

## Human Rights Due Diligence Process

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

Yes, the Sustainability section of our website indicates a “Fish Guide” which states where each tuna specie used in production is caught, as well as the method of catch. In particular, the following is the main type of fish we use in production:

- Skipjack TUNA:
- Scientific Name: Katsuwonus Pelamis
- Method of Catch: Purse Seine
- Where caught: Western Pacific Ocean (FAO 71)

The Company’s complete Fish Guide can be found here:

<https://www.centurypacific.com.ph/webfisheries.php?d=cD02JnBjPTAmYmQ9MTk5>

Moreover, our Tuna 2020 Traceability Declaration’s includes a Tuna Traceability Commitment which is a pledge that “all tuna products in our supply chain will be fully traceable to the vessel and trip dates and that this information will be disclosed at the Point of Sale either on the packaging or via an online system.”

A copy of our Tuna 2020 Traceability Declaration can be found here:

<https://www.centurypacific.com.ph/articlepdf/Tuna%202020%20Traceability%20Declaration.pdf>

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

Yes, as discussed item 4 above, the main fish we use in production is Skipjack TUNA which is primarily sourced in the Western Pacific Ocean.

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?

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.

Yes, as discussed above, our Tuna 2020 Traceability Declaration's "Commitment to a Socially Responsible Tuna Supply Chain" covers a human rights due diligence policy to "ensure suppliers at least meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labor Organization's Conventions and Recommendations."

We likewise have a Policy Statement for Human Rights that guides all aspects of our business operation. Said Policy Statement for Human Rights can be found here: [https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF\\_Policy%20Statement%20on%20Human%20Rights.pdf](https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF_Policy%20Statement%20on%20Human%20Rights.pdf)

Internally, we have implemented an Ethical Trading Initiative and Business Ethics and Labor Code of Conduct that outlines our various policies, process, and procedures to protect human rights.

Excerpts of this follows:

1. EMPLOYMENT IS FREELY CHOSEN

- There is no forced, bonded or involuntary labor. Our worker/employees voluntarily agree to work/render service and exercise their right to labor which is deemed proper within the meaning of constitutional guarantees.
- Our workers/ employees freely applied for work and are required to submit employment requirements, including identity papers, and submit them before starting to work. They are also free to leave or express desire to be separated from employment.

- No gender preference in every hiring and age requirement is at least 18 years old and above.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED.

- All workers/ employees have the right to self-organization or form trade union.
- The Company recognizes the constitutional rights of worker to self-organization and peaceful concerted activities, including the right to strike in accordance with the law.
- Workers participation and representation in policy and decision making processes affecting their rights, duties, welfare, and benefits as maybe provided by law are well present at the Company. We have good grievance procedure and voluntary mode of settling disputes.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC.

- We have our active and efficient Health and Safety Committee who regularly conducts safety audits and assure compliance to the required health and safety processes in accordance with Republic Act. No. 11058 or “An Act Strengthening Compliance with Occupational Safety and Health Standards.
- All workers are given proper orientation on Safety/Health and Hygienic practices before they start working. A quarterly health and safety training / re-orientation are conducted to all workers both old and new. Seminars on First Aid/ Fire Brigade, proper grooming, are reinforced to this cause.
- We have sufficient, clean, and safe toilet/ sanitary facilities with enough supply of potable water.
- We have clean and hygienic canteen facilities, and resting areas for our workers convenience and comfort.
- The Safety and Health Committee is headed by the Safety & Health Manager and is composed of different representative from all functional departments. GMP/Hygiene Group is headed by the QA Manager. Both are reporting to the Plant Manager on these programs.

4. CHILD LABOR SHALL NOT BE USED.

- We religiously comply with the Republic Act No. 7610 known as the “An Act Providing for Stronger Deterrence and Special Protection Against Child Abuse, Exploitation and Discrimination.”
- As a responsible employer, the best interest of children shall be the paramount considerations undertaken by Management consistent with the provisions of the relevant ILO standards.

5. LIVING WAGES ARE PAID.

- The Company complies with all Wage Orders mandated by government. To date, our minimum wage is in compliance to the newly issued Wage Order RTWPB-IX-18.
- All workers/employees are issued individual Employee Action Form and Employee Pay Authorization indication their employment status, reason of action, salary amount, and other pertinent information duly authorized by management. No deduction will be effected expect for SSS, Philhealth & Pag-ibig, BIR, and other statutory deductions unless with express permission of workers concerned.

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. Some of the practical actions to ensure that modern slavery does not occur in the Company are covered by Ethical Trading Initiative and Business Ethics and Labor Code of Conduct mentioned above.

Apart from these, the Company also engages in the following:

- training staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;
- digital traceability of fish (across entire supply chain, or part only);
- prohibition on recruitment fees and other illegal deductions as determined by Labor Advisory No. 11 series of 2014 issued by the Department of Labor and Employment;

- ensuring freedom of association and collective bargaining by fishers/ their representatives (including unions);
- Independent supply chain auditing (in process ingredients and packaging)

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?

Human rights risks are prioritised based upon a risk assessment initially made at a per worksection level, and then each worksection level, then to the plant level/national level. This risk assessment gives us an awareness of the various human rights considerations where we operate and an assessment of our own operation.

We ensure that all of our employees, specially those with direct involvement in potential human rights risks, are continuously provided with trainings and seminars related to their role and are keep upbrast of latest company directions and polies on human rights.

We recognize that our business involves different stakeholders and we make sure that we have regular/routine business process reviews to ensure that human rights issues and risks are evaluated at the soonest possible time and that the appropriate remedies are implemented immediately.

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.

Yes, we have Grievance/Complaints Mechanism Policy that can be accessed in the workers' own language and in a way that grievances or complaints can be reported safely.

The key aspects of said Grievances/Complaints Mechanism Policy are as follows:

An individual who considers that they have a grievance or complaint that they have not been able to resolve directly with any other involved party should raise the matter with their immediate supervisor as a first step towards resolution. The two parties should discuss the matter openly and work together to achieve a desired outcome.

Employees are encouraged to air their complaints by either:

- Dropping their complaint or grievance in the suggestion boxes located at the Main Gate, Canteen Area and Locker area, or
- They can make a call or text to any managers or supervisors whom they are comfortable to report to.

The Manager or Supervisor should follow the steps outlined below:

- Make sure that the employee feels listened to and supported. You don't have to agree with what they say, but you must make sure that they know you will act on their concerns.
- If more than one person is present, establish the role of each person.
- Outline the process that is to be followed.
- Inform the parties that any information obtained in the conduct of the review is confidential.
- Listen to the complainant. Obtain a chronology of events (who, what, why, when, how etc).
- Run through the applicable policies and procedures (e.g. the organization's anti-discrimination policy) with the complainant.
- Ask the complainant what kind of outcome they are hoping for (best case scenario) and then talk them through next steps: e.g. you will discuss the matter confidentially with the HR manager or BU Head to determine a way in which to deal with the issue and report back to them within a set timeframe.
- Provide the complainant with the organization's confidentiality and non-victimisation agreement. Explain that they cannot be adversely affected because they have made a complaint, and explain who to report matters to internally if they do feel that they are being adversely affected.
- Provide the complainant with plenty of time to ask questions.
- Offer the complainant assistance (such as counselling through an Employee Assistance Program) or a way to get home safely if they are visibly upset.



- Provide the complainant with a direct contact number that they can call if they have any concerns or queries.
- Take accurate and detailed notes of all conversations (including dates, people involved) and attach any supporting documentation.
- If deemed necessary, provide the employee/individual with a written summary of the meeting and clarification of the next steps to be taken.
- The Manager must ensure that the manner in which the meeting is conducted will be conducive to maintaining positive working relationships, and will provide a fair, objective and independent analysis of the situation.

If the matter is then not resolved and the employee or individual wishes to pursue it, the issue should be discussed with a Human Resources Officer, then, if necessary, the CEO.

Again, the matter is to be discussed openly and objectively with management to ensure it is fully understood. If the grievance/dispute is one of a confidential or serious nature involving the employee or volunteer's Manager, the complainant may discuss the issue directly with the Human Resources Department or the CEO.

Aside from the above specific mechanism, our Company's Whistleblower Policy covers the general procedures on how an employee can "blow the whistle" by reporting in good faith suspicions of illegal, unethical or other inappropriate activity, which includes possible human rights violation, without fear of retaliation. This encourage all employees to disclose any wrongdoing that may adversely impact the company and the Company's stakeholders.

Said Whistleblower Policy can be found here:

[https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF\\_Whistleblower%20Policy.pdf](https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF_Whistleblower%20Policy.pdf)

No human rights concerns connected with the Pacific tuna sector been reported via the Company's complaints 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?

Yes, the remediation plan forms part of the Grievances/Complaints Mechanism Policy as described in item 9 above.

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)?

The Company has no identified issues or complaints on modern slavery in our own operations or in its supply chain.

## Reporting

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

Yes, as discussed in item 1, our 2017 Annual Report reports the Company's Code of Business Conduct and Ethics which covers the fundamental principles of our Employment & Labor Laws & Policies. These principles include, among others:

1. All workers are treated with respect and dignity
2. Work is conducted on the basis of freely agreed and documented terms of employment with legal compliance
3. Work is conducted on a voluntary basis with no forced or compulsory labor
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Moreover, part of our Tuna 2020 Traceability Declaration is a pledge to “eliminate any form of slavery”, as well as a commitment to “meet minimum social standards in management practices as recommended in the Universal Declaration of Human Rights and the International Labor Organization's Conventions and Recommendations” all throughout the Tuna Supply Chain.

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## 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.

The company has not encountered significant obstacles or challenges in implementing its human rights commitments. We remain compliant in both General Labor Standard and Occupational Safety & Health as part of the mandatory standard by Philippine and International Laws.

To further ensure that our human rights commitment extends to third parties, our Policy on Subcontracting allows our company to conduct random audit on the compliance to Service Level Agreement between the parties, which among others cover the following items:

1. Terms and conditions of employment
2. Security of tenure
3. Freedom of employment
4. Health and safety of the workers

All our employees are also encouraged to timely report any incident or instance that involves violation of human rights. The Whistle Blowing phone line are easily accessible to all of them. Where matters are brought to our attention, the Company do not tolerate reprisal against any one who raises a valid “issues” or incident in good faith.

Said Whistleblower Policy can be found here:

[https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF\\_Whistleblower%20Policy.pdf](https://www.centurypacific.com.ph/investorpdf/SEC%20Filings/CNPF_Whistleblower%20Policy.pdf)

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.

Yes, we are participating in (c) Tuna 2020 Traceability Declaration.

A copy of our Tuna 2020 Traceability Declaration can be found here:

<https://www.centurypacific.com.ph/articlepdf/Tuna%202020%20Traceability%20Declaration.pdf>

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

Our Company believes that compliance to our Policy on Human Right is everyone's responsibility. To ensure that no modern slavery or any violation of human right is committed within our company or along our supply chain, all employees and their teams also receive training on said Policy, with a focus on potential human rights risk that may possibly arise in their work area.

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](#)