



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: Conga Foods

Human Rights Policy

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

We have an up to date Tuna Sustainability Policy on the Sole Mare website.

<http://www.solemare.com.au/sustainability/>

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

It is a requirement of all our supply partners to meet the international standards for labour rights set out for tuna production. Our commitment and the compliance of our suppliers is unwavering and confirmed by regular, third party auditing of tuna production facilities. This means that we request full transparency and reporting of our tuna supply chain including product origins, work practices and sustainable fishing processes and to ensure slavery-free and ethical work practices.

All Conga Foods supply partners undergo regular 3rd party auditing.

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

Conga Foods are fully prepared to adhere to the requirements of The Modern Slavery Act passed by the Australian Parliament 2018 including providing modern slavery statements that detail source and actions taken across supply chain from 2020.

Human Rights Due Diligence Process

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

Sole Mare ensures that tuna only comes from stock areas that are deemed to be sustainable for the targeted species and use latest ISSF (International Seafood Sustainability Foundation)^[1] data to change sourcing zones each year. To improve visibility, our cans are being printed with the fishing zone (on shelf by September 2017). Our internal auditing system allows for Sole Mare to track any can of tuna down to the individual fishing vessel, fishing zone and period of catch.

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

Primarily our supply partners fish in FAO71 and FAO77 due to our FAD free requirements. These fall within the Pacific region.

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.

We ensure all our supply partners meet International standards for business ethics and labour code of conduct. This includes ensuring all supply partners provide us with valid, up-to-date policies and auditing reports.

We communicate our policy externally through our website, and we also offer consumers the opportunity to track the origins of each tin of our Tuna products online.

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 only work with supply partners that meet the modern anti-slavery requirements.

We have a digital traceability of fish feature on our website

(www.solemare.com.au/sustainability/)

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?

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.

Please see attached Conga Code of Conduct policy, which includes our grievance handling.

We have a Conga Anti-Slavery Policy under review, we can send the finalised version next week.

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?

We have a Conga Anti-Slavery Policy under review, we can send the finalised version next week.

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 have not had any instances of modern slavery in 2018.

Reporting

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

We are currently in discussions with Greenpeace regarding changing our sustainability ranking, in which we will be providing access and full transparency of our 3rd party auditing documentation to rectify this misrepresentation.

Once we have our finalised anti-slavery policy, this will be made public.

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 have not had any obstacles or challenges.

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 have our own in-house traceability tool, in which our QA department manager traceability enquiries.

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

Conga Foods are fully prepared to adhere to the requirements of The Modern Slavery Act passed by the Australian Parliament 2018 including providing modern slavery statements that detail source and actions taken across supply chain from 2020.

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](#)