



# 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:** Kaufland

## Human Rights Policy

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

Our Kaufland Code of Conduct is a binding part of our contracts with suppliers and business partners. All business partners obligate themselves to meet social standards through the whole supply chain (please take attachment No. 1 into consideration). Our website will support with more detailed information regarding Kaufland Code of Conduct (<https://unternehmen.kaufland.de/unsere-verantwortung/machen-macht-den-un...>).

To underline our commitment for sustainable fish and fishery within our sourcing process we implemented in 2015 our International Fish Policy (<https://unternehmen.kaufland.de/unsere-verantwortung/machen-macht-den-unterschied/nachhaltige-sortimentsgestaltung.html#einkaufsrichtlinien>)

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

Within our Kaufland Code of Conduct you will find a chapter 3: Prohibition of Forced Labour

We are aware that Forced Labour has many different faces and facets. Therefore modern slavery is one of the essential and challenging topics (e.g. Migrant workers and refugees) and is covered by chapter 3 of our Code of Conduct.

Our strategy regarding fish and products with fish focused on the first stage: Certifications like MSC, Global GAP, ASC, FADs and Dolphin Safe as a necessary requirement within our sourcing process. On a second stage we evaluate the standards behind certifications constantly.

For this reason we start an intense exchange with MSC regarding the improvement of their social standards. This is an activity initiative supported by all German retailers.

From our point of view label organisations take also responsibility to review their standards and open up the scope of their certification and audit procedure. In this concrete case of MSC it means, that workers on the trawlers are under the scope of the audits.

We are committed to increase our offer of sustainable fish products. Beside our own brand products we offer our brands like followfish and fish tales.

<https://unternehmen.kaufland.de/unsere-verantwortung/machen-macht-den-unterschied/nachhaltige-sortimentsgestaltung.html>

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

One part of your responsible sourcing strategy includes the increase of certified and labeled products (e.g. MSC, ASC) according to an ambitious timeline.

In Addition to our Kaufland Code of Conduct we have a risk oriented procedure to fulfil Human Rights Due Diligence. Therefore all Kaufland Business Partners are categorized in high and low risk categories. The base of evaluation is the country of origin of resources (please take attachment No. 2 into consideration).

## Human Rights Due Diligence Process

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

Yes. The transparency and traceability can be tracked on the products via QR Code. The online platform ftrace provide detailed information on product level.

For more information please click: <http://www.ftrace.com/index.php/en/gb>

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

Yes, partly.

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?

In general: if Kaufland is informed about human rights violations actions will be taken immediately.

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.

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.

*(ii) engaging with NGOs, fishers/ their representatives (including unions) and policy-makers* — yes, we are in a constant contact and dialog with Greenpeace Germany, WWF, ISSF

*(x) independent supply chain auditing* — yes, we are in a constant contact and dialog with MSC

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 take the answer of question 3.) into consideration.

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.

Kaufland has a corporate complaint mechanism which is open for every business partner, supplier, producer, member of the society etc. The online tool provides a quick access and different languages are available (<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=11kfl12&language=ger>)

<https://unternehmen.kaufland.de/ueber-kaufland/unsere-werte/compliance.html>

Until today we did not receive any complaints / concerns connected with the Pacific Tuna sector via this channel.

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?

According to our standard procedure of Kaufland Social Audits every business partner and supplier receive afterwards a Management Action Plan with defined due dates of implementation. It is important that the supplier confirm Kaufland Management Action Plan to ensure that all measurements are implemented. Follow up process (e.g. Re-Audit) are in place to check if all requirements are implemented. Regarding of the complexity of

the whole supply chain of canned tuna we did not yet conduct Kaufland Social Audit in the tuna producing industry.

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)?

No cases are known or recorded.

## Reporting

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

## 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 recognize in general that there are industries, commodities and countries of origins which are constantly facing the challenge to comply with social standards (even national regulations). The process of frequent development is very often a long term challenge and many external influences are slowing down the process. We are looking forward to keep in touch with NGOs, which have a deep knowledge and expertise. Together with different stakeholders, suppliers and all parts of the supply chain we are promoting the idea of dialog, exchange, implementation of effective measurements and projects.

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.

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](#)