



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: Tri Marine Management Company

Human Rights Policy

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

Tri Marine has been an active member of the Seafood Taskforce since its inception. We are jointly guided by the [Taskforce Code of Conduct](#), and enforcement our social responsibility standards outlined in our [Group Code of Conduct](#). These and other resources can be found on our website at www.trimarinegroup.com

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

Yes. Forced labour is explicitly prohibited within our supply chain. The Tri Marine Group of companies, our business partners, vendors, and suppliers are all required to meet the standards in our [Group Code of Conduct](#).

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

Yes, our [Group Code of Conduct](#) is publicly available on our website and prohibits modern slavery.

Human Rights Due Diligence Process

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

Yes, Tri Marine has mapped supply chains in all regions where we buy and sell tuna products.

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

Yes, Tri Marine sources from 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?

We apply the Seafood Taskforce Standard in addition to our existing Code of Conduct.

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.

Tri Marine conducts global staff training for all our operations, regularly engages with NGOs and policy makers, mandates compliance with applicable social responsibility commitments in our commercial documents, provides full traceability on all products, adheres to the Seafood Taskforce standards, and conducts independent audits of our supply chain. At sea transshipments for purse seine vessels are prohibited, but allowed for longliners subject to a signed observer declaration form providing evidence of monitoring of the operation.

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?

Areas of known higher risk are prioritized based on several factors including geographic location of offloads, particularly for vessels fishing in distant waters that may lack regulatory oversight. Audits that find red flags or non-conformities will require time bound corrective actions.

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.

Tri Marine does not currently have a published grievance mechanism but as part of our commitment to the Seafood Taskforce auditable standard, a formal system will be established in 2019. To date, Tri Marine has not been faced with any major human rights concerns from other outlets.

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?

Corrective actions are issued on a case by case basis and require a time bound follow up period for suppliers to prove any instances of abuse or modern slavery are eliminated.

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 identified any cases of modern slavery in our supply chain in 2018.

Reporting

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

To date we have not made any public reporting on modern slavery but it is public knowledge that we are members of the Seafood Taskforce and will adopt and implement the Vessel Auditable Standards for our entire supply chain.

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 primary challenge is overcoming obstacles related to developing and distant water fisheries. There are large discrepancies in cultural norms, technology, and monitoring oversight compared to some developed countries. Communicating new standards, educating fishers, implementing new systems and eventually monitoring compliance day to day presents a considerable challenge for private companies to take on.

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 members of the Seafood Taskforce.

We have recently acquired Fair Trade certification for our Solomon Islands Purse seine fishery.

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](#)