



Canned Tuna Brands - New Companies - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2020/21)

* The term 'modern slavery' used in this survey is taken to include forced labour, slavery, human trafficking, servitude, bonded and child labour.

Company: Bolton Food

Canned Tuna Brands: Rio Mare, Saupiquet, Palmera, Isabel, Cuca and Massó

Note: Bolton Food is a subsidiary of the Bolton Group and serves as the Group's business unit for tuna brands. Tri Marine is owned by the Bolton Group and is the primary supplier of tuna to Bolton Food. The Bolton Food division is responsible for the major European brands of tuna listed above.

Bolton Food corporate structure is as follows:

- Bolton Food S.p.A.: Italian company responsible of Rio Mare and Palmera brands.
- Bolton Foos s.a.s.: French company responsible of Saupiquet brand.
- Grupo Conservas Garavilla S.L.: Spanish company integrated in Bolton Food in 2019, responsible of ISABEL, Cuca and Massó brands.

Human Rights Policy

1. Has your company made a public commitment to respect to **human rights**? Yes / No
If yes, please provide full details and a link.

YES.

Bolton Food, as Bolton Group's food business unit, has adopted the Bolton Group's Human Rights Policy grounded in the Group's core values and Code of Ethics. These documents are published on the company's corporate web site:

Links:

<https://boltongroupwecare.it/en/archivio/human-rights-policies>

<https://boltongroupwecare.it/en/archivio/ethical-code>

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

Our ***Human Rights Policy*** is a high-level company policy which applies to implement and support the internationally recognized Human Rights Declarations and Conventions.

To further implement these commitments on Human Rights, and **in order to ensure full compliance along the supply chain, they have been also included in the mandatory corporate policies** that Bolton Food has developed for its suppliers highlighting and identifying key principles of social accountability applicable to its supply chain operations in the sea.

Furthermore, Bolton Food's primary supplier of tuna, Tri Marine, is part of the Bolton Group and maintains a strict Ethical Sourcing Policy consistent with Bolton Food policies.

These policies specifically address modern slavery's related concerns (child and forced labor; freedom of association and collective bargain; health, safety and working conditions including wages; diversity and discrimination; rights of local population; regular employment and no harsh treatment):

- **BOLTON FOOD TUNA SOURCING POLICY**

1. Link for Bolton Food S.p.A.:

http://qualitaresponsabile.it/sites/riomarequire/files/download/bolton_food_tuna_sourcing_and_sourcing_policy_30062019_0.pdf

2. Link for Grupo Conservas Garavilla:

<https://www.isabel.net/wp-content/uploads/2020/02/2.-C%C3%B3digo-de-Conducta-de-Proveedores.pdf>

- **BOLTON FOOD CODE OF CONDUCT FOR TUNA SUPPLIERS- VESSELS**

1. Link for Bolton Food S.p.A.:

https://qualitaresponsabile.it/sites/riomarequire/files/download/vessel_code_of_conduct_for_tuna_suppliers_-_bolton_food.pdf

2. Link for Grupo Conservas Garavilla:

<https://www.isabel.net/wp-content/uploads/2020/02/3.-Gu%C3%ADa-para-Proveedores-de-At%C3%BAn.pdf>

- **TRIMARINE ETHICAL SOURCING POLICY:**

<http://www.trimarinegroup.com/wp-content/uploads/2020/10/TMI-Ethical-Sourcing-Policy-v3.1.pdf>

3. Has your company adopted a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Yes / No

If yes, please provide details.

YES.

Every tuna supplier must sign the ***Bolton Food Tuna Sourcing Policy*** and the ***Bolton Food Code of Conduct for Suppliers – Vessels*** in order to become an homologate supplier.

These commitments constitute mandatory contractual clauses for any purchase of tuna or products with tuna carried out by Bolton Food. Bolton Food will randomly verify compliance with these requirements. **Non-observance of any of these obligations will constitute breach of contract, in which case our company reserves the right to take the legal actions.**

In addition, in order to inform our suppliers about the documentation that will be required, we have developed internal guidelines for both verifications: *Tuna Sourcing Policy* and *Code of Conduct for Vessels*.

See links on answer 2.

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part? Yes / No

YES

We were the first tuna company in the world with all its supply chain **ISO 22.005** certified. We control every step of our tuna supply chain through an **extended ISO 22005 certification** from the port of landing to the plant.

Our **traceability system** offers complete information on the entire supply chain, that is, we have complete data on all tuna from catch to use and shipment to customers.

This traceability system has already been digitized and is available to consumers in real time for **Rio Mare and Saupiquet brands** with dedicated information to Human Rights.

<https://www.riomare.it/tracciabilita-etichetta-alimentare>

<https://www.saupiquet.com/tracabilite/>

A traceability consultation system is also available through our web sites for **ISABEL and Cuca brands**:

<https://www.isabel.net/trazabilidad/>

<https://www.conservascuca.com/es/trazabilidad>

With regard to all supply vessels, Bolton Food's suppliers must be in compliance with all **ISSF Conservation Measures** as stated on the *Tuna Sourcing Policy* and sign the *Code of Conduct for Tuna Suppliers – Vessels* with the timeline addressed on this document itself. This includes ISSF Measure 2.1 on Product Traceability. Furthermore, Bolton Food's primary tuna supplier, Tri Marine, is an ISSF Founding Member together with Bolton Food and has demonstrated 100% compliance in its annual 3rd party audits against ISSF

measures. In addition, and in accordance with our commitments with ISSF, all the vessels we source from must be included on its publicly available Proactive Vessel Register.

We have taken further action by voluntarily registering our 4 vessels in the Pacific on transparentsea.org, offering public access to vessel tracking.

It is also important to highlight these important commitments on Human Rights that our brands have made:

1. 100% of ISABEL brand tuna in Spain will be ***AENOR Tuna from Responsible Fishing*** certified at the end of 2020, which is the unique certification in the world auditing vessels under the ILO 188.

www.atundepescaresponsableaenor.com

2. Bolton's French brand, Saupiquet, is the first to launch a Fair Trade and MSC certified range of tuna products in France through sourcing from Tri Marine operations in the Solomon Islands. In November 2019, Tri Marine accomplished a major sustainability milestone by achieving Marine Stewardship Council (MSC) certification for longline caught albacore and yellowfin tuna from the Solomon Islands, adding to its existing MSC certification for pole and line and purse seine skipjack and yellowfin. This marks the first occasion that all three major tuna fishing gear types have been certified within the same WCPO fishing grounds, demonstrating a rare example of well-balanced management and strong collaboration between industry and government to achieve sustainable outcomes for tuna fisheries including supply chain labour practices. In addition to Tri Marine's MSC certification of the Solomon Islands yellowfin and skipjack tuna fishery, their fishing vessel operations (NFD) achieved Fair Trade USA certification in early 2019. NFD has worked diligently to meet the rigorous Fair Trade standards for worker welfare and safety, as well as environmental sustainability. Application of Fair Trade standards has helped NFD's fishermen be better organized, ensure crew and stevedore safety and improve overall community well-being.

5. Does the company source tuna from the **Pacific** region? Yes / No

If yes, provide location (by country).

YES.

Bolton Food's tuna coming from the Pacific represents **74%** of its total tuna supplies. Our supply comes from vessels that are legally registered and fishing in either the Eastern Pacific under IATTC regulations, or the Western and Central Pacific under WCPFC rules. These vessels are represented by these flag states:

China, Papua New Guinea, Taiwan, Venezuela, Kiribati, Micronesia, Ecuador, New Zealand, Philippines, El Salvador, Panama, Belize, Guatemala, Peru, South Korea, Indonesia, USA, Solomon Islands.

Issues to be highlighted:

1. We own 4 vessels operating in the Pacific with base port in Manta, Ecuador; two under Ecuadorian flag and two under Spanish flag. All of them are certified under the Spanish public *norm UNE195.006 "Atún de Pesca Responsable – Tuna from Responsible Fishing"*, the only certification in the world considering the ILO C188 for its social and labour standards, together with best fishing practices, control and maritime security, and food security. Our vessels are audited by AENOR, the Spanish certification body, every year.

<https://atundepescaresponsableaenor.com/en/la-certificacion-apr/buques-certificados-apr/>

Furthermore, all four vessels are 100% compliant with ISSF Conservation Measures as can be verified on the ISSF PVR:

<https://iss-foundation.org/knowledge-tools/databases/proactive-vessel-register/>

2. Solomon Islands fishery, both MSC certified and Fair Trade certified, is one of our most important fisheries we source from in the Pacific. Around 21% of our tuna supplies come from this fishery.
3. Supply chain transparency information: In accordance with the provisions of ISSF Conservation Measure 2.4 (Supply Chain Transparency, Audit, Reporting and

Purchase Requirements) which entered into force on January , 31st 2020, we make public the percentage of our purchases (measured in round ton equivalents) for each of the following Fishery Source category:

http://qualitaresponsabile.it/sites/riomarequire/files/download/bolton_food_supply_chain_transparency_information.pdf

<https://www.isabel.net/wp-content/uploads/2020/02/8.-Transparencia-de-la-Cadena-de-Suministro.pdf>

<http://www.trimarinegroup.com/wp-content/uploads/2020/03/Tri-Marine-ISSF-Supply-Chain-Transparency-032620.pdf>

4. We have a public commitment to increase our supply from fishing vessels registered in the 'Proactive Vessel Register' of ISSF.

<https://www.isabel.net/wp-content/uploads/2020/04/compromiso-pvr-garavilla.pdf>

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 / No
If yes, 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 assessment 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.

Bolton Food started its sustainability path many years ago setting ambitious targets along the journey.

The most important milestones are as follows:

1. **Bolton Food and WWF agreement**: This partnership was established in 2017 to reduce the environmental impacts of its business practices and to deliver large-scale improvements to help safeguard oceans and marine life. This collaboration has the overarching objective of guaranteeing full transparency and traceability to the Bolton consumer base and strengthening their policy on human rights along the entire supply chain by advocating for social and labor standards: (page 27):

http://qualitaresponsabile.it/sites/riomarequire/files/download/wwf_bf_partnership_progress_report_year_2.pdf

2. **Bolton Food is founding member of ISSF**: According to the yearly audits that ISSF carried out to check and evaluate the progress of its members about their tuna supply chain on sustainable basis against its Conservation Measures, Bolton Food and Conservas Garavilla are 100% compliant since 2017:

<https://iss-foundation.org/what-we-do/verification/participating-company-audit-reports/download-info/grupo-conservas-garavilla-isabel-final-compliance-report-for-activities-in-2019/>

<https://iss-foundation.org/what-we-do/verification/participating-company-audit-reports/download-info/bolton-alimentari-final-compliance-report-for-activities-in-2019/>

3. **Code of Conduct for Tuna Suppliers – Vessels**: As we have mentioned before, the *Code of Conduct for Tuna Suppliers – Vessels* is the tool to evaluate the respect and compliance of our tuna suppliers with regard to Human Rights. This document not only contains the principles and values that govern our actions, but also provides a checklist with the minimum criteria that we require in addition to the metrics for verification. At this time, we have developed an operating procedure for our suppliers in Italy and France and we are planning its launch for implementation in 2021.

4. **Human Rights Check List for Internal Audits:** Regarding processing plants, last year we developed a *Human Rights Check List for Internal Audits* based on the most relevant Human Rights international conventions and protocols. In the Pacific Region we carried out two internal audits in Ecuador, on our owned plant and on the plant of Bolton's main tuna supplier (Seafman- Trimarine).

5. **Bolton Food as pilot partner to Conservation International (CI):** We are currently analyzing the results of a pilot assessment carried out on one owned vessel (Charo) by Conservation International in September 2019 based on a benchmarking between the Monterey Framework and the *UNE 195006 Tuna from Responsible Fishing*. The conclusions determined that the Spanish standard, unique in the world and that integrates the provisions of ILO Convention 188, is aligned with the requirements of Monterey Framework Principle 1, thus becoming a global reference for the integration of social aspects and labor in the FIP. From this point on, Bolton Food and CI will collaboratively design a set of recommendations to implement social safeguards that continue to improve social standards in this area during 2020.

<https://www.isabel.net/sostenibilidad/pesca/conservacion-internacional/>

6. **Bolton Food agreement with Greenpeace:** In 2018, Bolton Food defined a new long-term strategy for its Responsible Quality CSR program with specific goals and measures to be implemented in 4 areas: responsible fishing, producing, social, and nutrition. This strategy was developed with inputs and support from Greenpeace, and forms the basis of the agreement between Bolton and GP for 2019- 2024 for Rio Mare, Saupiquet and Palmera perimeter. Part of this agreement is based on Human Rights commitments which, along with the environmental ones will be assessed on their progress by an independent third party (MRAG Americas) on an annual basis. The document describing the audit protocol is published on:

http://qualitaresponsabile.it/sites/riomarequire/files/download/bolton_audit_policy_document_and_sops_-_15june2020.pdf

7. **Bolton Food partnership with Oxfam**: In order to develop a complete and full sustainable strategy in its supply chain, Bolton Food has agreed in June of 2020 to a multiyear agreement with Oxfam (this agreement is not public and must be confidential until the communication event to be held at the end of November 2020). This partnership ensures Bolton Food develops and implements an impactful human rights strategy based on a series of steps and a **four years roadmap**. The first component of this roadmap is to carry out a human and worker rights assessment focused on policies assessment and risk identification, risk assessment on human rights and supply chain awareness and implementation of the policies and measures. This program will enable us to take a systemic and comprehensive approach to assess the actual and potential human rights impacts at the company's tuna supply chain, to integrate assessment findings within the management, to track the effectiveness of the company's response and to communicate externally about how the company is addressing its human rights impacts.

7. Has your company taken **practical action** to ensure that modern slavery does not occur in your company's (or its subsidiaries') operations and supply chains for tuna procurement from the Pacific? If yes, please describe.

Examples might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;
- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;
- iii) cascading *contractual* clauses in supply agreements;
- iv) digital *traceability* of fish (across entire supply chain, or part only);
- v) prohibition on *recruitment fees*;
- vi) protective measures to protect against exploitation of *migrant* fishers;
- vii) prohibition on sourcing from suppliers that *transship* at sea, or use *flags of convenience*;
- viii) ensuring *freedom of association* and collective bargaining by fishers/ their representatives (including unions);

- ix) oversight of *recruitment* or labour hire entities; and
- x) independent supply chain *auditing*.

Please provide details.

YES

As mentioned above and also in the former responses, apart from our policies on HR, we have just developed a partnership with OXFAM that will ensure that modern slavery does not occur in any stage of our operations and supply chain.

Regarding the examples given by this questionnaire, we can also highlight as follows:

1. We have planned and are carrying out specific trainings on Bolton policies regarding human rights for all company departments and senior managers.
2. We expressly mention *contractual* clauses prohibiting modern slavery addressed on our *Code of Conduct for Suppliers and Vessels* to become an homologate supplier for Bolton Food.
3. We have real time digital *traceability* across the entire supply chain for our brands. This system allows consumers to know the FAO zone, vessel, fishing method, tuna specie, etc., and also information about the fishing community and human rights.
4. We highlight the prohibition on recruitment fees; protective measures to protect against exploitation of migrant fishers; prohibition on sourcing from suppliers that trans-ship at sea, or use flags of convenience; ensuring freedom of association and collective bargaining by fishers/ their representatives (including unions); oversight of recruitment or labour hire entities... along the mentioned Code of Conduct.
5. Our commitments with ISSF, WWF, Greenpeace and APR certification on vessels are externally audited.
6. Tri Marine underwent Fair Trade assessment and achieved certification for its Solomon Islands operations. Annual audits are required to maintain that certification. The Fair Trade standards have rigorous social accountability requirements and can be found [here](https://www.fairtradecertified.org/business/standards/capture-fisheries-standard).

<https://www.fairtradecertified.org/business/standards/capture-fisheries-standard>

In addition, Tri Marine covers a minimum of 10% of its supply chain with 3rd party auditing against the Seafood Task Force social standards and requires corrective actions whenever non-conformities are identified.

8. If your 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?

Thanks to our partnership with Oxfam, we will carry out a Human Rights Impact Assessment, starting in Ecuador where Bolton Food has the biggest processing plant and also their four vessels operating in the Pacific. We will be able to study the results and together prioritise which risk to address first.

Prior to our partnership with Oxfam, Bolton had already taken steps to identify and address human rights risks. The first one was to implement a Human Rights self-assessment for suppliers. Since 2018, we have started investigating our suppliers' practices on the following topics:

- Free Association and Collective Bargaining
- Working and Pay Conditions
- Child and Forced Labour
- Health & Safety
- Diversity
- Supply chain management

We covered more than 80% of our suppliers' turnover with self-assessment analysis. Right now, we did not identify major non-conformities.

The second one was to implement a HR internal audit in our own plants (Ecuador and Morocco) in 2019 in order to have a diagnosis. This internal audit was based on the Human Rights Check List highlighted before. The findings of these internal audits were shared with Oxfam as part of the desk analysis in the first phase of our agreement.

In addition, our main supplier Tri Marine has been a member of the multi stakeholder Seafood Task Force since 2016 and leads its Tuna Subgroup in an effort to develop and

apply industry-wide social protections and prevent IUU fishing. To implement the Code on fishing vessels, Tri Marine was instrumental in establishing Vessel Auditable Standards which were finalized and communicated to all its suppliers in early 2019.

Since instituting its Ethical Sourcing Policy, Tri Marine has conducted a number of 3rd party audits utilizing firms Verite, UL and Key Traceability. In addition, Tri Marine is updating its Ethical Sourcing Policy Management System to be ISO compliant and has committed to covering 20% of its suppliers with office audits and 10% of its suppliers with 3rd party vessel level audits in 2021.

A number of factors create risks for fishers that are often greater than those faced by land-based workers including adequate health and safety measures onboard vessels and even indicators of forced labour. This is particularly the case for distant water longline fishing vessels by nature of long fishing trips and tight living and working quarters. Bolton Food does not source longline caught tuna, but does support its affiliate, Tri Marine, in addressing this higher risk area. Tri Marine is fully committed to the implementation of the STF Vessel Auditable Standards to address, correct and prevent unsafe working conditions and unfair treatment of fishers including long liners as part of its Ethical Sourcing Policy.

Grievance Mechanism

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? Yes / No

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 your company's complaints mechanism? Please provide details.

YES.

Grievance mechanisms is present in the *Code of Ethics for Grupo Conservas Garavilla* and in *Bolton Group Code of Ethics*.

This means that there are two grievance mechanisms at Bolton Group level in order to cover every country:

1. **Grupo Conservas Garavilla**: We have a grievance mechanism that was put in place in Dec 2019 for Spain, Ecuador and Morocco. It is managed by an independent external third party that guarantees confidentiality and free and safe access by mail, email and phone. Currently, the grievance mechanism is fully operational in Spain for Bolton Food employees and is in the implementation phase in the rest of geographies as it had to be postponed due to COVID crisis.

2. **Bolton Group**: There is a grievance mechanism for Bolton Group Italian companies, which includes Bolton Food S.p.A., since January 2020. This mechanism is managed internally and guarantees confidentiality and free and safe access by mail. Currently, it is in its communication phase not only for employees but also for every stakeholder.

3. **Tri Marine**: Requires itself and its suppliers to maintain grievance procedures for fishers and fish processors and is auditing suppliers to insure they meet the requirement. This includes Is a mechanism that provides anonymity and confidentiality and that is available to workers in a language they understand. Vessel and fish processor grievance procedures must include the following points.
 - a. Channels of reporting;
 - b. Mechanisms to allow workers to report to someone other than their direct supervisor;
 - c. Procedure for management follow-up of reported grievances;
 - d. Procedure for workers to monitor status of complaints;
 - e. Appeal system for unfavourably resolved complaints or disciplinary action.

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?

If modern slavery is identified in our supply chain, as stated in the contracts signed with our suppliers and also as highlighted in our *Code of Conduct for Suppliers*, in case of any reasonable suspicion of non-compliance with our requirements in relation to human

rights, suppliers are requested to immediately inform us through the official channels established for this purpose and, in any case, may communicate the incidents to their business contact, to the Compliance Function or to the Corporate Social Responsibility Directorate.

In the event of a non-compliance with the Policy, its causes will be studied and a plan will be defined, always in cooperation with the affected supplier, in order to promote compliance.

With regard to other operations and steps along the supply chain, as mentioned before, we have just signed a partnership with OXFAM to work on a Human Rights Impact Assessment. The findings of the assessment are the basis for the next steps of a four years roadmap.

11. How many **instances** of modern slavery has your company **identified** over the last 3 years (from and including 2018) in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific?

Please describe by reference to:

- (a) Number of instances (broken down for each calendar year)
- (b) Do you know where they occurred? Please describe event(s).
- (c) How did the company respond to address the issue(s)?

We did not identified to date any instances of modern slavery.

Reporting

12. Does your company communicate, or **report**, externally on steps taken to address modern slavery? Yes / No

If yes, please provide relevant details. This could include statements issued under the [UK](#) or [Australian Modern Slavery Acts](#).

We communicate all our commitments and achievements through sustainability reports and partnership reports, including HR related topics:

1. **2019 Bolton Group Sustainability Report** → will be published by the end of November 2020
2. **2018 Bolton Group Sustainability Report:**
https://boltongroupwecare.it/sites/bolton2016csr/files/documents/bolton_group_-_sustainability_report_2016-2018_rev.pdf
3. **2019 WWF Partnership Progress Report:**
https://qualitaresponsabile.it/sites/riomarequire/files/download/wwf_bf_partnership_progress_report_year_2.pdf
4. **2017 Bolton Food Socio-environmental Report “The Right Course”:**
https://qualitaresponsabile.it/sites/riomarequire/files/download/bolton_csr_report_eng.pdf
5. **2019 Grupo Conservas Garavilla- Bolton Food Non Financial Report and Global Compact Progress Report:**
<https://www.isabel.net/wp-content/uploads/2020/07/Informe-EINF-2019-150.pdf>
6. **2019 Tri Marine implements an Annual Sustainability Report.**
<http://www.trimarinegroup.com/2020/05/14/tri-marine-releases-2019-annual-sustainability-report/>

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? Yes / No

If yes, please explain and provide details of any strategies to overcome them.

Yes. Tuna supply chain is a very extensive, large, distant and vessels make very long trips. We had to limited our supply chain in order to be compliant with our policies and guarantee the minimum conditions required by our company. To assure the full

sustainability of our supply chain, as mentioned we have signed multiyear agreements with expert independent bodies and NGO and we are annually audited by third parties.

14. Does your company actively participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing?

If yes, please provide details.

1. ISSF founding members (Luciano Pirovano, Global Sustainable Director Bolton Food, is the Chairman of the Board of ISSF). ISSF will approve, within November 2020, a new resolution on HR through which every member must have a public policy on HR and related topics.
2. Seafood Task Force: through Tri Marine (Bolton Group) (Matt Owens, Sustainability Director Tri Marine, is Subgroup Head for Tuna)
3. Tuna 2020 Traceability Declaration
4. OPAGAC Code of Conduct
5. Global Compact Spain. In 2021, Bolton Group will be also a signatory member.
6. UN Sustainable Ocean Principles: we are part of the UNSOP Guidelines working group
7. Transparentsea.org (NAVAMA)

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

See our brands web sites:

www.isabel.net

www.riomare.it

www.saupiquet.com

COVID-19 impacts

16. Has the **COVID-19** pandemic affected your ability to identify, assess or respond to modern slavery risks in your tuna supply chains? Yes / No

Please explain and provide details, including any actions (a) taken or (b) delayed/suspended, by you.

Yes.

Overall, COVID crisis has slow down and postpone some of our planned activities related to modern slavery risks:

1. We had to postpone making public our partnership with an international Human Rights specialized NGO. This delay stems from extra time needed to develop a human rights assessment impact and a comprehensive due diligence plan focused on our tuna supply chain's social and labour aspects.
2. We had to postpone the total implementation of the grievance mechanisms.
3. We had to postpone the activities of the remediation plan agreed with CI for our owned fleet in the Pacific.
4. We had to postpone the launching of new HR audits on suppliers.
5. We had to postpone the planning of the due diligence policy with our supply chain.