



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: Metro

Human Rights Policy

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

Yes, Human Rights statement on website:

<https://www.metroag.de/en/company/responsibility/our-attitude>

and recently in CR Report:

<https://reports.metroag.de/corporate-responsibility-report/2017-2018/responsibility-metro/empower-people.html>

(overarching) Human Rights Policy:

https://www.metroag.de/~assets/metro/documents/responsibility/human-rights-policy-metro_en.pdf?dl=1and
https://www.metroag.de/~assets/metro/documents/responsibility/human-rights-commitment-list-metro_en.xlsx?dl=1

and specific non-food own brand social standards policy (« mirrored » food roll-out in piloting phase)

https://www.metroag.de/~assets/metro/documents/responsibility/policy-for-social-standards_en.pdf?dl=1

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

Yes. Our objective is to ensure socially equitable working conditions throughout our procurement channels. As we expect our business partners to assume and observe similar values to ours, the METRO Code of Conduct for Business Partners is a fixed component of every business relationship. This code of conduct includes the observance of human rights as per UN and ILO standards, labour and social security issues based on the principles of the 4 key labour standards of the ILO, protection of the environment as well as regulations on corporate ethics, in particular on combatting corruption and bribery, on cartel and competition laws as well as on data protection. The 3 main principles of the Consumer Goods Forum Resolution on Forced Labour are also decisive for us. All our own-brand agreements further include a clause on social standards that gives us a legal tool to enforce our demands. In addition, the application of standard social systems is an essential part of the process and at the same time an important tool. They help us protect against possible risks from violations. See here for supply chain from the documents CoC, Business Partners, Social Standards Policy and/or Human Rights Policy e.g.: "The respect of Human Rights is a fundamental value of METRO. We are committed to respecting all Human Rights, as articulated in the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work by the International Labour Organization (ILO). This commitment relates to our own employees as well as to our business relations within our value chain." And read in Human Rights Policy under 2. Process // A. Business Partners in the Value Chain

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

Approach for Sustainable Sourcing raw materials

https://www.metroag.de/~assets/metro/documents/responsibility/approach-for-sourcing-of-agricultural-raw-materials_en.pdf?dl=1

Sustainable Sourcing Policy

<https://www.metroag.de/~assets/metro/documents/responsibility/policy-for-sustainable-sourcing.pdf?la=en>

All Sourcing Policies of METRO as well as our approach to ensure compliance with social standards in our supply chain are to be found here:

<https://www.metroag.de/en/company/responsibility/procurement>

Business principles

https://www.metroag.de/~assets/metro/documents/company/compliance/business-principles-metro-ag_en.pdf?dl=1

Code-of-

Conduct: https://www.metroag.de/~assets/metro/documents/company/compliance/metro_code-of-conduct-business-partner_en.pdf?dl=1

Human Rights Due Diligence Process

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

Partial supply chain (included import service provider, factories), catching vessels are checked only via catching certification.

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

Yes, in pacific region the sourcing countries included Thailand, PNG, Philippines, Ecuador and Spain with catching zone mostly FAO 071, FAO 077, FAO 087.

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?

Focus was on non-food own brand but now piloted to mirror to food own brand: Read from Human Rights Policy (own ops and supply chain), Fair Working Conditions (own ops) (<https://www.metroag.de/~assets/metro/documents/responsibility/metro-global-principles-on-fair-working-conditions.pdf?dl=1>) and Social Standards Policy (supply Chain) regarding our Process.

Generally:

1. METRO identifies Human Rights Impacts by e.g. hot spot analysis and materiality analysis (<https://reports.metroag.de/corporate-responsibility-report/2017-2018/servicepages/search.php?q=risk+assessment&pageID=54512>)
2. Any findings are handled via our Social Standards Management Process (see Social Standards Policy)
3. Tracking of responses is done via direct contact to our Business Partners, Trainings, Corrective Action Plans (e.g. via amfori BSCI, Bangladesh Accord remediation plans).
4. Communication we are rather conservative

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.

Particular Training dedicated on Human Rights (Focus Forced Labour) is currently in the roll out throughout our 26 METRO countries. 2 successful pilots have been carried out in TR and PK. Until end Sept 2020 all METRO countries will go through training. Compliance with our Fair Working Conditions Policy is being assessed via visits in the METRO countries (approx. 15 have been conducted already)

METRO is heavily engaged in international platforms e.g. signed Tuna Traceability 2020 declaration, NASF, Global Sustainable Seafood Initiative (GSSI) and projects, e.g. read here under sustainable fishery <https://reports.metroag.de/corporate-responsibility-report/2017-2018/responsibility-metro/secure-planet/supply-chain.html>

All our own-brand agreements further include a clause on social standards.

METRO also offers a Traceability App PROTrace to its customers in order to trace information back to its source hence disclose supply chain and manage accordingly. Approximately 800 fish products (and around 2,000 meat products) can currently be traced in Germany with the PRO TRACE app. Read more:

<https://reports.metroag.de/corporate-responsibility-report/2017-2018/servicepages/search.php?q=traceability&pageID=54540>

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?

Prioritisation takes place via risk management process and materiality analysis. Effectiveness is checked and tracked via direct contact to our Business Partners, Trainings, Corrective Action Plans (e.g. via amfori BSCI, Bangladesh Accord remediation plans).

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.

Our employees can consult their managers as well as company compliance officers. In 2016 METRO established a publicly available tool which allows any company or individual person involved in our business activities to report situations that are not in compliance with METRO values, policies and/or legal regulations.

The website is accessible through the METRO Compliance page:

<https://www.metroag.de/en/company/compliance>

as well as directly: <https://www.bkms->

[system.net/bkwebanon/report/clientInfo?cin=13MET20&language=eng](https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=13MET20&language=eng)

All reported incidents are investigated by our experts and processed in due time.

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?

Most important is thorough investigation via third parties and respective targeted corrective actions / remediation plan. Identities are to be secured in order to ensure “anonymity” to the victims. First extent and form of the issue is to be determined. Remedial actions may also include monetary compensations. Measures shall have several levels of time scales short term, mid and long term actions. Changing management structures (e.g. thorough look at its systems and protocols, policies and assessment procedures, and other aspects of its social responsibility program to determine the root causes) takes its time, political and societal structures even more so. Capacity building is another long term element in order to prevent future violations.

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 no case detected.

Reporting

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

Yes, Human Rights statement on website:

<https://www.metroag.de/en/company/responsibility/our-attitude>

and recently in CR Report:

<https://reports.metroag.de/corporate-responsibility-report/2017-2018/responsibility-metro/empower-people.html>

Reporting on social standards compliance

<https://reports.metroag.de/corporate-responsibility-report/2017-2018/key-performance-indicators/empower-people.html#accordion16>

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.

Not particular to tuna supply chains but in general: As easy as it sounds, first and foremost, we realize that information is the pre-condition for action. No Human and/or Fundamental Rights violation will be detected in first place if our employees and/or partners in the value chain neither see nor understand a possible violation. Just like information, knowledgeable ability to act is of utmost importance. METRO therefore strongly builds on training and capacity building measures in order to enable appropriate handling of possible infringements. This includes particular tangibility and hands-on character of our trainings reflecting real-life cases in order to offer trainings of greatest value. Of course, we also acknowledge that our work cannot be separated from the rapidly changing economic and political conditions in our operating markets. Human Rights violations are complex and cannot be viewed in isolation. Hence, a systematic and holistic approach to fight such challenges is essential for finding solutions. Furthermore, sustainable success will only be possible by working in a collaborative manner and by bundling collective action among stakeholders and our peers in the business community.

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.

Tuna 2020 Traceability Declaration, NASF (North Atlantic Seafood Forum), GSSI, and Consumer Goods Form (CGF)

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](#)