



## **American Tuna Inc. Supply Chain Transparency Statement**

### **The California Transparency in Supply Chains Act of 2010 – S.B.657**

The California Transparency in Supply Chains Act requires certain companies that trade in California to publicly disclose their efforts to address slavery and human trafficking risks in their direct supply chains for goods offered for sale.

While it is not a requirement for us to disclose this information, we are committed to being a transparent company, and therefore disclose this information voluntarily. This disclosure covers all American Tuna Inc. branded products<sup>1</sup> and private label products supplied to US retailers.

Modern slavery is a global issue which affects all industries and geographies – American Tuna Inc. is committed to understanding the modern slavery and human trafficking risks within our business and supply chains and to put controls in place to mitigate against the risks.

We are committed to ensuring that workers in our supply chains are treated with dignity, and that human rights are respected. We support the UN Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights and take seriously our responsibility to prevent, mitigate and remediate human rights abuses through our own actions, and collaboration with others.

#### **1. Risk Assessment**

American Tuna Inc. completes a bi-annual risk assessment of supplier partners<sup>2</sup> which allocates a high, medium or low risk score. The score is calculated based on information from the Food Network for Ethical Trade (FNET) on generic country level risks, reported risks specifically relating to the raw materials in our products, and our own reviews of supplier partner compliance to our policies. Supplier partners identified as in higher risk locations are prioritised for closer engagement and verification. Three of our supplier partners are in locations classified as higher risk<sup>3</sup>.

#### **2. Addressing identified risks – internal verification processes**

American Tuna Inc. has a number of procedures that enable us to identify and mitigate any modern slavery and human trafficking risks;

Supplier Approval: All our direct supplier partners are approved through a process which includes a review of their compliance against our criteria.

Responsible Sourcing Code of Practice for Suppliers: This policy outlines the standards all our tier one supplier partners are expected to meet. It includes a focus on the ETI base code, health & safety, the environment and social audit requirements. All new supplier partners will be required to accept this

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<sup>1</sup> American Tuna, Fishin' Families, The Cat's Fish, Deck Hand, Pole and Line

<sup>2</sup> Tier one supplier partners refer to the processing factories who provide finished product for American Tuna

<sup>3</sup> Maldives and Thailand are classified as higher risk locations in our supply chains.

before supply commences. Supplier partners in higher risk locations who employ migrant workers must also work towards compliance to our human rights policy.

Human Rights policy: This policy identifies the most vulnerable groups within our supply chains. It gives very detailed requirements of supplier partners relating to these vulnerable groups. It is available in English, and Thai on our website.

We have completed on-site assessments with 100% of our supplier partners in higher risk locations against our human rights policy. These assessments identify areas for improvement and lead to shared action plans. We work collaboratively and provide support to supplier partners to become compliant directly, or through local expertise.

### **3. Addressing risks – external verification**

American Tuna Inc. outlines our requirements for external verification through social audits in our Responsible Sourcing Code of Practice. All supplier partners in medium and higher risk locations are required to have social audits (e.g. SEDEX, BSCI) at a risk-based frequency (1-3 years). Low risk supplier partners are required to register on SEDEX and complete a self-assessment questionnaire.

All of our supplier partners in medium and higher risks locations have completed social audits as per our requirements. It is a requirement of these social audits that workers are informed of the human, and employment rights, and that supplier partners provide grievance mechanisms.

We monitor the closure of audit non-compliances, and support supplier partners to close these.

### **4. Certification**

There is no certification at present which ensures compliance to labour standards, including human trafficking. We therefore use the above policies and processes, alongside third-party social audits to mitigate and verify compliance to standards. We are committed to address any identified issues.

### **5. Training**

In 2020/2021 the staff who provide technical support to American Tuna Inc. supplier partners and visit supplier partners in medium and higher risk locations all received modern slavery training from the UK based Food Network for Ethical Trade (FNET). This included training on spotting the signs of modern slavery on supplier partner visits, and appropriate action.

### **6. Continuous Improvement**

American Tuna Inc. takes its responsibility to address human trafficking risks seriously – we are committed to identifying where the risks of modern slavery are in our supply chains and to ensuring we are mitigating against these risks and responding appropriately where these arise including ensuring remedy for those affected. We will continue to achieve this by working with our customers, supplier partners and also through engagement with industry groups.

Last updated: 30 July 2021