



**American Tuna, Inc. Supply Chain Transparency Statement**  
**The California Transparency in Supply Chains Act of 2010 – S.B.657**

**Introduction**

The California Transparency in Supply Chains Act requires companies to publicly disclose information regarding their efforts to eradicate human trafficking and slavery within their supply chains.

While this legislation does not apply to American Tuna, we are committed to working transparently to promote human rights, and therefore disclose this information voluntarily.

This disclosure outlines the steps taken by American Tuna to prevent modern slavery during the financial year 2023 – 24. It covers all American Tuna, Inc. branded products<sup>1</sup> and private label products supplied to US retailers.

American Tuna, in collaboration with World Wise Foods Group, is fully committed to working proactively to understand the modern slavery risks within our supply chains and to putting controls in place to mitigate against them. Over the past 12 months we have been able to strengthen our approach, including:

- Updating our Responsible Sourcing Code of Practice to ensure it continues to remain fit for purpose
- Further direct worker engagement through our partnership with Labor Solutions and worker interviews
- Enhancing our mandatory modern slavery training

In the year ahead we will continue to develop our approach to managing the risk of modern slavery within our business and supply chains and ensure our strategy continues to respond to changing risks

This statement was approved by American Tuna Chief Executive.

A handwritten signature in black ink, appearing to read "Sarah Eames".

Sarah Eames  
Chief Executive, American Tuna

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

## Organisation structure and supply chains

American Tuna is part of the World Wise Foods Group which is made up of three separate business entities as – World Wise Foods, Nature’s Finest and American Tuna.

American Tuna is a distributor supplying private label and branded ambient food products to leading retailers, manufacturers, and food service businesses in the United States of America (U.S) (‘Customers’). We have U.S offices with colleagues covering commercial, finance, supply chain, product development and technical functions. Storage and distribution is handled by contracted third parties.

World Wise Foods has overall responsibility for sustainability for the Group. Elements of technical and supply chain is also managed by World Wise Foods colleagues.

We have direct relationships<sup>2</sup> with our supplier partners and co-packers<sup>3</sup> that produce our finished products in Costa Rica, Indonesia, Thailand and the U.S.

In some cases World Wise Foods purchases the raw material (whole round fish) for delivery and processing to supplier partners and co-packers. Our source fisheries for all American Tuna products are Indonesia, New Zealand, Maldives, South Africa and the U.S. We have full visibility of these supply chains back to a group of fishing vessels, at minimum.

## Policies

We are committed to ensuring that workers in our supply chains are treated with dignity, and that human rights are respected. We fully 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 both through our own actions, and collaboration with others.

The two key policies applicable to all supplier partners and co-packers which demonstrate and monitor these commitments are:

[Responsible Sourcing Code of Practice](#): This policy outlines the standards all our supplier partners and co-packers are expected to meet. It includes a requirement to comply with the ETI base code, which states employment must be freely chosen, and monitoring via ethical audits.

[Human Rights policy](#): This policy outlines our expectations relating to ensuring and promoting human rights. It identifies the most vulnerable groups within our supply chains and provides detailed requirements relating to each. This includes those most

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<sup>2</sup> Supplier partners are managed by World Wise Foods. Copackers are managed directly by American Tuna.

<sup>3</sup> Co-packers produce final products using raw material and packaging purchased by World Wise Foods and/or American Tuna.

at risk of falling victim to modern slavery – migrant workers, children and young workers. The policy also forms a framework for us to assess supplier partners and co-packers, through a gap analysis, and subsequently drive continuous improvement.

## **Governance**

World Wise Foods Chief Executive and American Tuna's Chief Executive have overall responsibility for ensuring both the Group and American Tuna meet their human rights commitments. The Board of Directors for both companies also hold this responsibility.

Working in collaboration with senior managers and supplier partners, delivery of our human rights policies and procedures is led by the Head of Sustainability who reports directly into the World Wise Foods Chief Executive. All applicable policies and procedures are approved by World Wise Foods and American Tuna respective Chief Executives, and Boards of Directors alongside relevant members of Senior Management.

## **Risk Assessment and management**

World Wise Foods Group conduct a Supplier Partner Human Rights Risk assessment quarterly – all American Tuna supplier partners and co-packers are covered in this assessment.

The risk assessment reflects:

- Country risk (as determined by the FNET country risk ratings)
- Type of labour used (seasonal, permanent, agency or migrant)
- Ethical performance in their most recent ethical audit
- Knowledge of supplier partners capability and capacity

The scores determine which supplier partners or co-packers we prioritise engaging on human rights issues; this list is typically dominated by those in high-risk countries<sup>4</sup>.

We gather insights on emerging risks through our engagement with relevant multi-stakeholder initiatives and country-level partnerships. Campaigners, activists, and whistle-blowers can also play an important role in helping us identify where some of the biggest risks lie. We also capture the views of workers through direct worker engagement including informal conversations, interviews, and worker surveys.

## **Due Diligence**

Our Human Rights due diligence approach outlines the ongoing risk management process we follow to identify, prevent, mitigate and account for how we address adverse human rights impacts connected to our business. The outputs of our due diligence (the steps taken to actively manage risk) for 2023- 24 is summarised below.

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<sup>4</sup> High risk countries as determined by the Food Network for Ethical Trade (FNET) Country Risk ratings

- **Internal verification**

New Supplier Approval:

A documented approval process is in place for all potential new direct supplier partners or co-packers. No new direct supplier partners or co-packers can be approved without sign-off from the Head of Sustainability.

All new supplier partners and co-packers are required to sign the Responsible Sourcing code of practice before supply commences. In early 2024 we updated the Responsible Sourcing Code of Practice to ensure it continues to remain fit for purpose. All supplier partners have been asked to sign this new version to demonstrate their on-going commitment to the principles outlined. This includes a commitment to ensuring employment is freely chosen, all overtime is voluntary and adherence with the 'Employer Pays Principle'.

Human Rights policy gap analysis:

We also monitor compliance with our Human Rights policy by conducting a gap analysis 1:1 with all supplier partners. This exercise involves direct conversations with HR teams and workers as well as a review of relevant policies and procedures. To date, we have completed a gap analysis with all American Tuna supplier partners in high-risk countries. The average compliance rate is 76%.

- **External verification**

Audits:

We monitor compliance with the ETI Base Code through our ethical compliance programme. As outlined in our Responsible Sourcing Code of Practice, all supplier partners are required to have 3<sup>rd</sup> party social audits (e.g. SEDEX, BSCI) in line with customer requirements. Where there are no customer requirements, 3<sup>rd</sup> party audits or an approved alternative are determined on risk-based frequency.

75% of American Tuna's active supplier partners were audited in the 2023-24 FY. We monitor the closure of audit non-compliances, and support supplier partners where required. We recognise the limitations of audits in detecting modern slavery indicators and take a 'beyond compliance' approach across our supply chain - examples as below.

Direct Worker Engagement:

Recognising the importance of amplifying worker voice, direct worker engagement is a key area of focus under our Human Rights approach.

All audits conducted under our ethical compliance programme include worker interviews. We continue to engage directly with Sedex and 3<sup>rd</sup> party audit bodies to enhance the quality of auditing in relation to responsible recruitment.

In 2023-24 we also enhanced our direct worker engagement at our supplying site in Thailand, where this is a high number of migrant workers. We conducted our own worker interviews, using a 3<sup>rd</sup> party consultant and independent translators. All

interviews included questions on freedom of movement and recruitment fees and costs. In collaboration with Labor Solutions, we also deployed a worker satisfaction surveys. Utilising an independent facilitator and translators, we were able to engage 411 workers, representing over 25% of the workforce. The survey included questions related to withholding of wages and excessive overtime, both of which are forced labour indicators.

Fisher welfare:

We recognise that the risk of modern slavery may be greater beyond our supplier partner and co-packer sites and further down the supply chain. In our seafood supply chains, we ensure full visibility back to, at minimum, a group of vessels. This year we have sought to enhance our visibility of working conditions on vessels, at port side and cold stores within our tuna supply chain. This has included obtaining visibility of any ethical audits conducted at cold stores, visiting an example cold store in the Maldives, and visiting the South African albacore fishery. This exercise has enabled us to better understand the risks at lower tiers of the supply chain and support the resolution of any issues raised. We now intend to increase our engagement with the American albacore fishery.

This year we reassessed all our fisheries using the SEA Alliance Fishery Risk Tool. This uses data from several indices and ratings systems to produce a high-level baseline assessment of human rights risks. The focus for assessment is human trafficking, forced labour, and child labour, no significant concerns were raised.

Further detail on our work to promote human rights in the Maldives fishery can be found below.

### **Certification**

We use the above approach to verify compliance to standards at our direct supplying sites.

For our fish raw material American Tuna commits to sourcing 100% of our seafood Responsibly from fisheries that are certified to a Global Sustainable Seafood Initiative (GSSI) recognised standard, or that are actively working to meet the expectations of these standards – further detail on our seafood sourcing approach can be found [here](#).

The main certification used in our seafood supply chains is the Marine Stewardship Council (MSC). We are in on-going dialogue with the MSC to ensure this standard better reflects human rights risks in seafood supply chains.

### **Collaborating for Change**

We recognise the importance of working transparently and collaboratively to address complex human rights risks. This year we have played an active role in a number of multi-stakeholder initiatives (MSI's) in order to further progress industry action to tackle modern slavery.

FNET Responsible Recruitment Working Group:

World Wise Foods Head of Sustainability continues to lead the FNET Responsible Recruitment Working Group, a space for sharing knowledge and insights on responsible recruitment and remediation approaches. We are committed to sharing our own learnings from implementing EPP in this group and supporting others on their responsible recruitment journey. This year, in collaboration with other multistakeholder initiatives, we have led on a 'Study into the implementation of responsible recruitment practices and the Employer Pays Principle (EPP) in the global tuna processing sector.'

**Seafood Ethical Action (SEA) Alliance:**

The SEA Alliance is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights. We are a member of the advocacy working group which seeks improved regulation and enforcement to accelerate improvements in human rights and labour standards for workers. This year the group has continued to engage with the Marine Stewardship Council (MSC) to strengthen the labour aspects of the MSC Standard, engaged governments of key source countries encouraging the ratification of relevant legislation, and conducted a review of our strategy in collaboration with strategic partners.

**International Pole and Line Foundation (IPNLF):**

This year we have continued our collaboration with IPNLF Maldives as we seek to further promote human rights on vessels. Although a change in government in 2023 has stalled progress with the launch of a National Grievance mechanism, we have developed a migrant worker information document containing key information of relevance to migrants both prior to departure and during their time in the Maldives. This document was developed in consultation with key stakeholders including government departments and migrant workers already in the Maldives. We are now awaiting feedback from the new government ahead of its publication.

### **Training on Modern Slavery**

All colleagues who provide technical support to American Tuna supplier partners and visit supplier partners in high-risk locations are required to complete both human rights and modern slavery training as part of their induction to the business.

This year we updated both trainings to ensure they continue to remain fit for purpose including detail on both spotting the signs of modern slavery and mitigating the risks. 100% of relevant colleagues are now re-trained.

### **Plans for 2024 – 25**

We recognise that the risks of modern slavery are dynamic and can be quick to change. We will continue to work closely with our customer, supplier partners, co-packers and other relevant stakeholders to mitigate these risks.

In 2024 – 25, we will:

- Further promote human rights at vessel level in our source fisheries

- Ensure modern slavery training is provided to all American Tuna office colleagues
- Publish our updated source fisheries on our website

Last updated: January 2025