



How to EVALUATE AND MONITOR supply chain conditions

Action 1: Maintain transparent and traceable supply chains, starting with seafood products

STEP 1: MAP YOUR SUPPLY CHAINS

Buyer & Employer steps

- Require complete supply chain mapping from the vessel or feed level to the end buyer.
 - Supply chain mapping begins with identifying the actors in company supply chains, requesting information on regions they source from, and information about suppliers in their upstream operations, including but not limited to: names of upstream suppliers, address of suppliers' business headquarters, ownership of suppliers' business, and presence of subcontracting. Full supply chain mapping includes assessing supply chain traceability or requesting key data from suppliers.

STEP 2: DETERMINE WHAT PRODUCT DATA TO COLLECT FROM SUPPLY CHAINS

Buyer & Employer steps

- Identify what data to collect from supply chains, including which key data elements seafood companies, retailers, and foodservice companies need to implement in their traceability systems.

STEP 3: INCORPORATE TRACEABILITY

Buyer steps

- Update traceability systems and move towards traceability best practices.
- Participate in the refinement and implementation of industry-wide interoperability best practices.

Employer steps

- Put systems in place to collect data and maintain clear and updated documentation of company supply chains.
- Maintain a reliable and effective database or system for tracking this information and updating it regularly.

STEP 4: JOIN AN INDUSTRY INITIATIVE TO DRIVE TRACEABILITY

Buyer step

- Participate in traceability focused multi-stakeholder initiatives to provide knowledge, guidance, and collective actions.

Action 2: Collect data on human and labor rights conditions in supply chains

STEP 1: UNDERSTAND THAT COLLECTING DATA ON PEOPLE DIFFERS FROM PRODUCTS

Buyer & Employer steps

- Learn about the unique aspects of data collection on worker well-being in supply chains. This involves recognizing key distinctions between the collection processes for environmental sustainability data and social responsibility information.

STEP 2: DETERMINE WHAT INFORMATION TO COLLECT ON HUMAN AND LABOR RIGHTS CONDITIONS IN SUPPLY CHAINS

Buyer & Employer steps

- Companies need to identify what data to collect within supply chains in order to assess working conditions.

STEP 3: COLLECT INFORMATION ON WORKING CONDITIONS

Buyer steps

- Request and collect information on human and labor rights conditions from all suppliers, and work to implement data collection processes that involve worker participation.
 - Make sure suppliers are aware of information that will be requested. To do this, extend this requirement to all segments of supply chains, by including data collection requirements in supplier expectations letters and supplier codes of conduct.

Employer steps

- Collect information on working conditions within own operations, and work to implement data collection processes that involve worker participation.
 - Use worker engagement mechanisms to regularly collect information about human and labor rights conditions directly from workers.
 - Maintain updated documentation about working conditions and labor rights in supply chains. Employers should communicate with upstream business operations to determine what data/information needs to be provided.

Action 3: Assess the risk of human and labor rights violations

STEP 1: ASSESS RISK OF FORCED LABOR AND MODERN SLAVERY IN SUPPLY CHAINS

Buyer steps

- Conduct a risk assessment of suppliers using publicly available resources to determine high-risk suppliers.
- For suppliers identified as high-risk, collect data directly from suppliers and conduct a detailed risk assessment.
 - Conduct this analysis for both current and prospective suppliers.
 - When possible, conduct an onsite visit.

Employer steps

- Conduct an internal assessment of own company operations to identify potential human and labor rights risks.
- Maintain updated documentation about working conditions and labor rights in supply chains to provide to upstream/downstream operations upon request.

STEP 2: ASSESS RISK FROM RECRUITMENT

Buyer steps

- Assess risk from recruitment at each tier of supply chains through the following:
 - Require complete disclosure of labor recruiters used, and the

recruitment policies and practices of each supplier, including: name of recruiter, address, license number, and license date of expiration.

- Collect data to assess whether suppliers are complying with company recruitment policies, and assess risk arising from responsible recruitment processes of own company and suppliers.

Employer steps

- Assess risk arising from responsible recruitment processes of own company and suppliers.
- Maintain documentation demonstrating that workers are recruited ethically, without having paid illegal or unauthorized fees in order to attain employment.

Action 4: Verify compliance with human and labor rights policies and expectations

STEP 1: MONITOR AND VERIFY COMPLIANCE

Buyer steps

- Determine compliance of suppliers to expectations established through company policies, codes of conduct and supplier expectations.
- Engage in the following on a regular basis:
 - Assess if suppliers have a code of conduct and review to ensure both supplier and company's own internal code of conduct are aligned with best practices.
 - Collect results of verification activities conducted by suppliers.

Employer steps

- Demonstrate compliance through a combination of worker engagement mechanisms, social audits, and seafood social certifications, and a combination of other tools.
- Provide downstream buyers with information that demonstrates compliance with policies, codes of conduct and supplier expectations.



How to protect workers and IMPROVE supply chain practices

Action 1: Drive responsible labor recruitment practices in supply chains

STEP 1: UNDERSTAND AND ALIGN WITH GOOD PRACTICE IN RECRUITMENT

Buyer steps

- Align with best practices for recruitment and recruitment fees as defined by labor experts, governmental agencies, and industry collaborations.
- Require suppliers to meet ethical recruitment standards - including to source workers from legal and ethical recruitment providers - and include this requirement in supplier expectations letters and supplier codes of conduct.
- In order to cascade expectations through supply chain, require existing and new suppliers to sign a declaration stating compliance with the company recruitment policies and legal requirements relating to recruitment.

Employer step

- Align with best practices for recruitment and recruitment fees as defined by labor experts, governmental agencies, and industry collaborations.

STEP 2: IMPLEMENT & VERIFY RESPONSIBLE RECRUITMENT PRACTICES

Buyer step

- Verify recruitment practices of suppliers.

Employer steps

- Implement (and require subcontractors to implement) ethical recruitment policies that observe legal compliance and respect all relevant laws and ensure:
 - No fees services to jobseekers and workers;
 - Provision of written contracts to workers, including a copy of the contract provided to worker, with all terms explained in language worker is fluent in; and
 - Provision to prevent the retention of worker documents, including identity, immigration documents, work permits or travel documentation.
- Verify recruitment practices in any downstream operations.

Action 2: Improve conditions for workers in supply chains

STEP 1: ESTABLISH WORKING/LIVING CONDITIONS AND PAYMENT SYSTEMS

Buyer steps

- Require suppliers to: 1) comply with relevant laws and uphold worker contracts with employers and recruitment agencies regarding working and living conditions and payment systems; 2) demonstrate that working conditions, living conditions, and payment systems for workers that meet buyer expectations.
- Look for evidence that the two standards above are in place, and that policies and practices are communicated to workers in their own language. All relevant contracts should be compliant with

national laws and the regional policies governing international labor recruitment; and all relevant buyer expectations are referenced for compliance purposes in supplier corporate policies, contracts, and employee orientation manuals/policy manuals. Buyer expectations may also be required to be posted in worksites. These should cover:

- Recruitment fees (adherence to both source and destination country laws regarding recruitment if there are foreign migrant workers; transparency regarding fees for all parties including workers; service contracts between the employer and recruitment agency are in place);
- Worker access to documentation (employer provides copies of contracts to all workers in their native language);
- Working hours and hours of rest (employer provides clear information to workers regarding working hours and rest as per workers' contract and national labor laws);
- Worker benefits and leave (employer provides clear information to workers regarding benefits and leave as per worker contracts and national labor laws);
- Living conditions (employer provides clear information to workers regarding living conditions such as housing options, rental costs, utility fees, housing policies to workers in advance, as part of the recruitment process. Basic human rights and rights to privacy are upheld); and
- Payment systems (employer has clear communications to workers regarding working hours, overtime, bonus system and target setting. Workers receive payslips in their native language, clearly itemizing all payments and deductions).

Employer steps

- Ensure safe and legal working conditions, living conditions, and payment systems in own supply chains, and comply with relevant laws, codes of conduct, and worker contracts.
- Ensure the following practices are in place and are being enacted uniformly and clearly. These should cover:
 - Recruitment fees (adherence to both source and destination country laws regarding recruitment if there are foreign migrant workers, transparency regarding fees for all parties including workers, and service contracts between the employer and recruitment agency are in place);
 - Worker access to documentation (provide copies of contracts to all workers in their native language);
 - Working hours and hours of rest (provide clear information to workers regarding working hours and rest as per workers' contract and national labor laws);
 - Worker benefits and leave (provide clear information to workers regarding benefits and leave as per worker contracts and national labor laws);
 - Living conditions (provide clear information to workers regarding living conditions such as housing options, rental costs, utility fees, housing policies to workers in advance, as part of the recruitment process. Basic human rights and rights to privacy are upheld); and
 - Payment systems (clearly communicate to workers regarding working hours, overtime, bonus system and target setting. Ensure that workers receive payslips in their native language, clearly itemizing all payments and deductions).
- Ensure there are clear communications channels and processes if workers have questions or concerns.

STEP 2: MONITOR AND VERIFY CONDITIONS

Buyer & Employer step

- Verify that suppliers comply with relevant laws and codes of conduct for working and living conditions, and ethical payment systems.

Employer step

- Provide documentation of compliance with relevant laws and codes of conduct for working and living conditions, and ethical payment systems.

Action 3: Engage workers by establishing trusted, effective worker voice and representation mechanisms, and commit to remedy rights violations.

STEP 1: BUILD TRUSTED GRIEVANCE AND WORKER VOICE MECHANISMS IN SUPPLY CHAINS

Buyer step

- Require that workers are able to safely access trusted grievance and worker voice mechanisms.

Employer step

- Establish grievance mechanisms for workers to capture grievances (e.g. restricted freedom of movement/retention of documents, physical or verbal abuse, nonpayment of wages) and implement practices to facilitate worker engagement in order to capture the feedback, experiences, and needs of workers.

STEP 2: ENSURE REMEDY OF WORKER GRIEVANCES

Buyer step

- Require that companies promptly and satisfactorily respond to human and labor rights grievances (e.g. restricted freedom of movement/retention of documents, physical or verbal abuse, nonpayment of wages) raised by workers, and provide evidence of remediation.

Employer step

- Establish and implement processes for the remediation of worker grievances and track outcomes and settlements of worker grievances.

STEP 3: SUPPORT FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING FOR WORKERS

Buyer step

- Require supply chain actors to uphold workers' rights to freedom of association and collective bargaining, and leverage market power, including participation in multi-stakeholder initiatives to advocate for policies that support freedom of association and collective bargaining for workers.

Employer step

- Establish the right of workers in supply chains to freely associate and promote workers' access to collective bargaining through unions and other collective negotiation instruments.

Action 4: Build capacity to implement best practices

STEP 1: TRAIN THROUGHOUT THE SUPPLY CHAIN

Buyer steps

- Train CEOs, directors, and buyers on risks.
- Train suppliers (including beyond first tier) in company supply chains on expectations and implementation of due diligence mechanisms, applicable legal and regulatory requirements, and data collection processes that can help identify areas of supply chains with the greatest risks.
- Offer suppliers information, education, guidance to help raise supplier awareness, recognition, and correction of issues.

Employer steps

- Train supervisors, workers and other relevant staff in social compliance, including: applicable legal and regulatory requirements, data collection processes, workplace rights, and company grievance and remediation policies.
- Train subcontractors on expectations and implementation of due diligence mechanisms, applicable legal and regulatory requirements, and data collection processes that can help identify areas of supply chains with the greatest risks.

STEP 2: ENGAGE IN COLLABORATIVE EFFORTS TO SYSTEMATICALLY MAKE IMPROVEMENTS

Buyer steps

- Participate in collaborative initiatives with other stakeholders including companies, trade unions, government agencies, NGOs/CSOs, and others.
- Institute an iterative and ongoing process of stakeholder engagement, identifying opportunities for collective action with other companies, trade unions, government agencies, NGOs, and multi-stakeholder initiatives. These activities provide companies educational, outreach, and stakeholder engagement opportunities to learn from and dialogue with stakeholders across fields.
- Advocate for public policy change.

Employer steps

- Partner with and support local and civil society organizations that protect and advocate for workers' rights.
- Explore the referral hub to learn about local civil social organizations working on the ground that can help to engage in improvements.
- Support government initiatives and international agreements that promote best practices for social responsibility in global supply chains.



How to COMMUNICATE requirements, goals, and progress

Action 1: Make a public commitment to socially responsible seafood

STEP 1: BUILD COMPANY SUPPORT FOR ADVANCING SOCIAL RESPONSIBILITY

Buyer & Employer steps

- Build support and make a business case for advancing social responsibility, determining what social responsibility criteria or issues are in line with company goals and strategy.

STEP 2: MAKE A PUBLIC COMMITMENT

Buyer & Employer steps

- Develop and share a public commitment to prioritize sourcing that meets social responsibility standards.

Action 2: Set and communicate expectations with all members of company supply chains

STEP 1: ESTABLISH AND COMMUNICATE EXPECTATIONS

Buyer steps

- Communicate expectations to suppliers via a Supplier Expectation Letter and a Supplier Code of Conduct, including provisions for health, safety, humane working and living conditions for workers.
- Ensure suppliers are signatory to company Supplier Expectations Letter and Supplier Code of Conduct.

Employer steps

- Review all terms of Expectations Letters and Codes of Conduct to ensure understanding of company requirements.
- Develop own Code of Conduct in line with best practices and highest expectations of upstream operations.
- Establish contracts with workers.

STEP 2: DEMONSTRATE AND VERIFY COMPLIANCE

Buyer step

- Verify suppliers are meeting supplier expectations.

Employer step

- Verify subcontractors are complying with expectations contained within Expectations Letters and Codes of Conduct.
- Provide data upstream as requested to demonstrate compliance.

Action 3: Publicly track and report information on supply chains

STEP 1: DETERMINE GAPS BETWEEN COMPANY PRACTICES AND BEST PRACTICES

Buyer & Employer steps

- Assess international frameworks for human and labor rights,

social responsibility best practices, and legal compliance to inform strategy for tracking and reporting.

STEP 2: CONDUCT A MATERIALITY ASSESSMENT FOR KEY STAKEHOLDER GROUPS

Buyer & Employer steps

- Identify stakeholder groups that have a fundamental impact on business operations and financial profit and loss.
 - Examples of stakeholder groups include: employees, workers in supply chains, consumers, financial institutions and investors, insurance providers, supply chain partners (e.g. suppliers, brokers, importers), government oversight organizations, and environmental and human and labor rights NGOs.
- Conduct a materiality assessment to identify the environmental, social and governance (ESG) issues that are most meaningful for stakeholder groups.

STEP 3: PUBLICLY REPORT ON PROGRESS

Buyer & Employer steps

- Provide key stakeholder groups with the rationale for specific social responsibility priorities based on the results of the materiality assessment.
- Establish baselines and set goals with clear timelines for improvement.
 - Be transparent and honest
 - Provide real-life examples and create case studies when possible
- Report on progress against both the baseline and the goal annually.

