



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 products¹ 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 an annual risk assessment of supplier partners² 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 review of supplier partner compliance to our policies. Supplier partners identified in higher risk locations are prioritised for closer engagement and verification. Three of our supplier partners are in locations classified as higher risk³.

2. Mitigating 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 potential new direct supplier partners must be approved through a process which includes a review of their compliance against our policies. No new direct supplier partners can be approved without sign-off from the Head of Sustainable Sourcing.

Responsible Sourcing Code of Practice for Suppliers: This policy outlines the standards all our 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 are required to accept this before supply commences. Supplier partners must also work towards compliance to our human rights policy.

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

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

³ Maldives and Thailand are classified as higher risk locations in our supply chains.

Human Rights policy: This policy identifies the most vulnerable groups within our supply chains, including those at heightened risk of modern slavery. It outlines detailed requirements of supplier partners to enable them to best protect these individuals. The policy is available in English and Thai on our [website](#).

Direct engagement: 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 to our policies either directly or through local expertise.

3. Mitigating risks – external verification

We use 3rd party social audits to verify compliance with our policies. As outlined 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 high-risk 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

We use the above policies and processes, alongside third-party social audits to mitigate and verify compliance to standards at our direct supplying sites. Beyond tier 1 American Tuna Inc. 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. 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.

5. Training

All staff who provide technical support to American Tuna, Inc. supplier partners and visit supplier partners in medium and higher risk locations have received modern slavery training from the UK based Food Network for Ethical Trade (FNET). This includes training on spotting the signs of modern slavery on supplier partner visits, and appropriate action should issues be identified. New staff into this function are also required to complete Modern Slavery training.

6. Continuous Improvement

American Tuna, Inc. takes its responsibility to address the risk of human trafficking and modern slavery seriously. We recognise that these risks are dynamic and can be quick to change. We will continue to work closely with our customers, supplier partners and also through engagement with industry groups on this important topic.