

Human Rights Impact Assessments (HRIAs)

As part of our deployment of the UN Guiding Principles on Business and Human Rights and to complement our social accountability process, we carry out Human Rights Impact Assessments (HRIAs).

HRIAs look into all the operations conducted in a given country, often identifying issues that go unseen during a third-party audit. Our HRIAs are carried out by independent expert organisations such as [Shift](#), [Impactt](#) and [Arche Advisors](#), who visit a representative sample of our own operations, our suppliers and other business partners. Engagement with workers is a key element of these assessments.

After each HRIA, the external expert organisation writes a report, which includes its key findings and suggested ways to address them. The report is shared with our local leadership, and our local team creates a country-specific, time-bound Corrective Action Plan, assigning responsibility for implementation and progress measurement at the local level.

In 2019 we carried out HRIAs in Guatemala, Thailand and Turkey — and their findings reflected the range of human rights issues that can arise in the specific culture and context of an individual market.

Working with suppliers in Thailand to improve human rights

In Thailand, we found issues that sadly remain common across the country — excessive working hours and inadequate periods of rest, discrimination (particularly relating to pregnancy), and constraints on the ability to associate freely and bargain collectively. We also found recruitment fees paid by employees that could potentially lead to debt bondage.

We'll continue to ensure our suppliers are clear on our requirements relating to Freedom of Association and to non-discrimination, including stopping the practice of pregnancy-testing.

A key finding of our HRIA in Thailand was that the global spotlight on the Thai seafood industry has pushed the risk of exploitation further into other sectors, including sectors that we rely upon in our supply chain. Through our membership of the Responsible Labor Initiative, we will provide all suppliers in Thailand, and our Procurement teams, with access to online training, including modules relating to identifying and preventing forced labour. We will also carry out face-to-face training for high-risk suppliers.

We know that our own purchasing and planning practices can sometimes contribute to adverse working conditions among our suppliers, for example through increased overtime. We will develop joint projects with suppliers to improve production flow and reduce unplanned peaks, and review our own practices to assess whether they could have an adverse impact on our suppliers' planning. We'll also carry out an analysis of what changes need to be made to reach the international standard of a maximum of 60 working hours per week (a higher standard than the legal maximum requirement in Thailand of 84 hours).



Addressing working conditions in Guatemala

In Guatemala, our HRIA found examples of a lack of minimum hiring age policies, a lack of written labour agreements, no overtime paid to workers for extra hours worked, a lack of written policies on safety and formal safety training, and a lack of a defined process for workers to raise concerns or gain access to remedy.

This shows the importance of an ongoing due diligence process and regular engagement with our suppliers, including sharing good practice and effective Corrective Action Plans for each of the issues identified.

Turkey: a need for awareness & due diligence

In Turkey, our HRIA found several key areas needing ongoing awareness raising and remediation: low wages; the lack of social security payments; high levels of contract work leading to an inability for some workers to access their rights; and a disproportionately low number of women workers.

Although the assessment found that sites that had been recently audited showed notable improvements, the findings again showed the importance of our continued work to raise the standards of audits and auditors and the need for different elements of our due diligence approach. We will run face-to-face training with our Turkish suppliers and support them during the review of Corrective Action Plans. We'll also improve dialogue and communication with our suppliers so it's easier for them to inform us when they need support.

