

# **CORPORATE RESPONSIBILITY & TRANSPARENCY POLICY GUIDELINES**

**FIJI'S SOCIAL POLICY GUIDELINES FOR FIJI FISHING INDUSTRY ASSOCIATION  
PREPARED BY LRQA & CONSERVATION INTERNATIONAL**

A collaboration between Conservation International, LRQA and Fiji Fishing Industry Association.  
Thank you all those who provided input and feedback



# CORPORATE RESPONSIBILITY & TRANSPARENCY POLICY GUIDELINES

## How to Use this Document

These Corporate Responsibility and Transparency Policy Guidelines (Guidelines) have been co-developed by Conservation International (CI) and LRQA in consultation with local governments, fishing industry partners, local civil society organisations and worker organisations.

**These Guidelines provide a practical roadmap for all Fiji Fishing Industry Association (FFIA) to develop or strengthen policies that support compliance and advance social responsibility standards.** They are part of a series of policy guidelines that address various human and labour rights issues. Collectively, these guidelines form a policy guidance that aims to:

- Support FFIA members to understand what human and labour rights are and why companies should safeguard human rights and implement remediation.
- Provide step-by-step guidance on how companies can manage and safeguard human rights in own operations and supply chains.
- Signpost tools and resources to support human rights safeguards.

Recognising that implementation will vary across organisations, these Guidelines have aligned recommendations with Fiji's national laws, regional frameworks and international conventions. It also incorporates indicators from the [Social Responsibility Assessment Tool for the Seafood Sector](#) to help organisations build awareness of fundamental human rights obligations and implement operational safeguards.

## Scope

The policy guidance encompasses a wide range of labour practices, including recruitment, working conditions, wages, health and safety, and worker welfare. It covers every stage of the employment cycle, from hiring to repatriation, supporting FFIA members' compliance and alignment with local law and international standards.

Specifically, it covers the following Social Improvement Areas which were deduced from the implementation of the 2023 Social Responsibility Assessment (SRA) of the Fiji Fishing Industry Longline Fleet, and the subsequent ground truthing workshop with industry, government, and local civil society organisations.

- Occupational Health and Safety (OHS) at Sea;
- Forced Labour;
- Child Labour;
- Employment Contracts;
- Corporate Responsibility and Transparency; and
- Freedom of Association and Collective Bargaining.

## Applicability

**These Guidelines provide a blueprint for fishing companies at all stages in developing their approach to human rights.** It is framed around the **Minimum, Good** or **Best** practices fishing companies and vessel owners can implement. The framework below will help companies evaluate the current maturity level of your approach to human rights, and what steps you need to take to improve your management systems.

	Framework Definition	Maturity Level of Human Rights Approach
<b>Minimum</b>	If the policies and procedures in this category are implemented, this will reflect <b>minimum compliance</b> with Fiji national legislation, regional frameworks, and SRA performance indicators.	<ul style="list-style-type: none"> <li>You are in the early stages of developing your approach to human rights.</li> <li>You have made some commitments as a company and have basic policies and procedures in place, most of which are focused on your own operations.</li> <li>Policies exist but little detail is provided on operational processes, governance, worker training and communication. There is no process to monitor adherence to ensure compliance.</li> </ul>
<b>Good</b>	If the policies and procedures in this category are implemented, this will reflect compliance with Fiji national legislation, regional frameworks, and SRA performance indicators, as well as efforts to go <b>above and beyond</b> minimum compliance.	<ul style="list-style-type: none"> <li>You are committed to human rights, understand what your risks and priorities are for your own operations and your supply chains.</li> <li>You invest in resources to prevent and reduce those risks.</li> <li>Your workers have received training but there is a limited/weak process to ensure compliance.</li> </ul>
<b>Best</b>	If the policies and procedures in this category are implemented, this will reflect compliance to Fiji national legislation, regional frameworks, and SRA performance indicators, as well as reflecting a <b>best practice approach</b> to managing and addressing human rights topics.	<ul style="list-style-type: none"> <li>Your human rights approach is led by your board and/or executive management.</li> <li>You are making progress in preventing, reducing and remedying risks in your own operations and your supply chains.</li> <li>Your workers have received effective training and there is a robust process to ensure compliance.</li> </ul>

# 1. What is corporate responsibility and transparency?

Corporate responsibility and transparency refers to a company's overall management systems and practices to ensure that it complies with all applicable laws, behaves in a socially responsible manner towards its employees, fishers, and communities, and communicates externally about its social responsibility policies and practices.

Companies in the fishing industry are subject to a complex set of local and international laws, as well as voluntary standards set by industry, certification bodies, buyers, or multi-stakeholder initiatives. For fisheries operators, it is especially important to ensure that all necessary licenses, registrations, and permits for recruitment, crewing, and operation are obtained and maintained. For small-scale fishers with limited resources, understanding and managing these complex and overlapping sets of standards can be challenging. It is therefore important that fisheries companies establish robust management systems to help them to understand their obligations and ensure compliance.

Beyond compliance, fisheries companies should consider their wider social and environmental impacts on the wider community, and communicate and disclose their efforts to improve transparency. This is aligned with best practices for human rights due diligence, as outlined in the UN Guiding Principles on Business and Human Rights and emergent mandatory human rights due diligence laws.

# 2. What are the compliance requirements?

Compliance with all applicable national laws and binding regional frameworks is a core aspect of corporate responsibility as it showcases a company's commitment to responsible business conduct. Given the evolving nature of legislation, establishing clear written policies and effective management systems is essential for companies to ensure ongoing compliance and the protection of human rights.

Human rights due diligence and meaningful stakeholder engagement are key tools to not only maintaining ongoing compliance but also for advancing human rights at work and standards across the industry. Practical guidance for developing these policies and management systems is detailed in the accompanying policy guidelines.

# 3. Practical Steps: What do you need to do?

This section outlines the **Minimum**, **Good** and **Best** practices for upholding corporate responsibility and ensuring transparency in the fishing industry. See **Appendix I** for the international guidelines, regional and national frameworks relating to the Minimum practices, and **Appendix II** for additional tools and resources to adopt these practices in your own policies and procedures.

	<b>MINIMUM</b>	<b>GOOD</b> In addition to MINIMUM	<b>BEST</b> In addition to GOOD
<b>Corporate responsibility</b>	<p><b>M1</b> Comply with Fiji national laws and regional frameworks to which Fiji is legally bound. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution</a> of the Republic of Fiji;</li> <li>• Fiji <a href="#">Employment Relations Act 2007</a>;</li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs) of the Western and Central Pacific Fisheries; and</li> <li>• <a href="#">Harmonised Minimum Terms and Conditions</a> (HMTCs) of the Pacific Islands Forum Fisheries Agency (FFA).</li> </ul>	<p>Maintain good compliance through basic tracking, periodic reviews and accountability.</p> <ul style="list-style-type: none"> <li>• Assign compliance oversight and responsibilities to senior management and appropriate departments.</li> <li>• Maintain a legal register or compliance tracker to identify applicable laws and track regulatory changes.</li> <li>• Provide a grievance mechanism or whistleblowing system for raising issues. See Section 4.3, <b>Forced Labour Policy Guidelines</b> for more information.</li> </ul>	<p>Ensure ongoing compliance with continuous monitoring, clear accountability and integrated legal oversight.</p> <ul style="list-style-type: none"> <li>• Designate compliance staff or a department with a direct line to senior management.</li> <li>• Review and update your policies and procedures at least annually or when there are changes in applicable laws and requirements.</li> <li>• Conduct regular internal audits to evaluate compliance.</li> <li>• Take appropriate actions to address any non-conformances identified in internal assessments, and preventative measures to avoid recurrence.</li> </ul> <p>For small vessel owners and/or operators who lack legal counsel:</p> <ul style="list-style-type: none"> <li>• Engage external legal support (e.g., outsourced legal advisors, subscription services or platforms, etc.) on per-need basis.</li> <li>• Participate in legal capacity building programs sponsored by government agencies, industry associations, and other NGOs.</li> </ul>
	<p><b>M2</b> Develop written social responsibility policies to meet the responsibility to respect human rights. Your policies should at a minimum:</p>	<p>Embed your social responsibility policies in written operational procedures and processes.</p> <ul style="list-style-type: none"> <li>• Assign oversight and responsibility to relevant senior management</li> </ul>	<p>Establish a monitoring system to ensure compliance with the local law and successful implementation of your policies.</p> <ul style="list-style-type: none"> <li>• Review and update your policies at least annually or when new risk</li> </ul>

	<b>MINIMUM</b>	<b>GOOD</b> In addition to <b>MINIMUM</b>	<b>BEST</b> In addition to <b>GOOD</b>
	<ul style="list-style-type: none"> <li>Commit to respecting internationally recognized labour and human rights standards – including but not limited to under the International Bill of Human Rights, and the ILO Fundamental Instruments. See <b>Appendix II</b> for relevant tools and templates.</li> <li>Communicate your social responsibility policies, including any updates, to workers in orientation sessions during onboarding.</li> </ul> <p>Your social responsibility policies should at least cover the following topics:</p> <ul style="list-style-type: none"> <li>Prohibit forced or compulsory labour. See the <b>Forced Labour Policy Guidelines</b> for additional information.</li> <li>Address child labour. See the <b>Child Labour Policy Guidelines</b> for additional information.</li> <li>Ensure a safe and healthy work environment, including both onshore and offshore work. See the <b>Occupational Health &amp; Safety at Sea Policy Guidelines</b> for additional information.</li> <li>Ensure the provision of written contracts to workers. See the <b>Employment Contract Policy Guidelines</b> for additional information.</li> </ul>	<p>and across appropriate departments for implementation.</p> <ul style="list-style-type: none"> <li>Maintain all records of the implementation of your policies.</li> </ul>	<p>emerges, to ensure ongoing compliance to Fiji’s national law and binding regional frameworks.</p> <ul style="list-style-type: none"> <li>Ensure your board and/or senior management endorse policies.</li> <li>Conduct regular reviews on implementation to inform continuous improvement.</li> <li>Involve workers in consultation and decision-making of your social responsibility policies and procedures.</li> <li>Engage in multi-stakeholder, worker-centric initiatives to improve social performance in the fishing industry.</li> </ul>

	<b><u>MINIMUM</u></b>	<b>GOOD</b> In addition to <b>MINIMUM</b>	<b>BEST</b> In addition to <b>GOOD</b>
	<ul style="list-style-type: none"> <li>Respect the freedom of association and right to collective bargaining for workers. See the <b>Freedom of Association and Collective Bargaining Policy Guidelines</b> for additional information.</li> </ul>		
	-	<p>Conduct <i>human rights due diligence</i> to identify, prevent and mitigate human rights impacts in your own operations and supply chain.</p> <ul style="list-style-type: none"> <li>Conduct risk assessments to identify and assess human rights risks to workers during all stages of recruitment and employment.</li> <li>Map the processes of you and your business partners (including labour agencies) to identify key hotspots and areas of risk linked to specific operational activities or business relationships.</li> <li>Develop action plans for preventing and mitigating identified risks.</li> <li>Document how risks are addresses and the related outcomes. Exercise transparency to share information to relevant internal and external stakeholders.</li> </ul>	<p>Continuously review and improve the due diligence processes.</p> <ul style="list-style-type: none"> <li>Conduct regular management reviews to identify gaps, analyse ongoing performance, and inform continuous improvement of the due diligence process.</li> <li>Conduct regular checks of business partners (including labour agencies) to track and verify the implementation of your social responsibility policies.</li> </ul>
	-	<p>Involve workers in the design, implementation and monitoring of your social responsibility policies related to human rights.</p>	<p>Actively engage with other relevant stakeholders for dialogue, consultation and decision-making.</p> <ul style="list-style-type: none"> <li>Identify other relevant stakeholders, such as trade</li> </ul>

	<b><u>MINIMUM</u></b>	<b>GOOD</b> <b>In addition to MINIMUM</b>	<b>BEST</b> <b>In addition to GOOD</b>
		<ul style="list-style-type: none"> <li>• Ensure a balanced representation of workers that is commensurate to your workforce.</li> <li>• Ensure that stakeholders can speak freely and meaningfully participate without the fear of reprisal.</li> <li>• Address any linguistic, cultural, gender or other barriers for meaningful participation of any worker groups.</li> </ul>	<p>unions, fishers’ families and local communities, civil society organisations, industry associations and government bodies.</p> <ul style="list-style-type: none"> <li>• Collaborate with credible partners and organisations that can help overcome persistent challenges and support improvement. See the <b>Forced Labour Policy Guideline</b> for additional information.</li> </ul>
<b>Transparency</b>	<p><b>M3</b> Communicate your social responsibility policies with all workers and relevant staff.</p> <ul style="list-style-type: none"> <li>• Display your social responsibility policies at the workplace.</li> <li>• Assign a designated manager and/or department to support workers with any questions about your policies and inform them of any updates.</li> </ul>	<p>Ensure that all staff are aware of your social responsibility policies and related information.</p> <ul style="list-style-type: none"> <li>• Provide training to all workers in a language that they understand.</li> <li>• Document all updates or changes to your social responsibility policies and operational procedures.</li> <li>• Use visual communication aids (e.g., infographics, translated posters, etc.) to ensure worker understanding.</li> </ul>	<p>Publicly communicate your social responsibility policies and performance.</p> <ul style="list-style-type: none"> <li>• Disclose your social responsibility policies and performance on your website.</li> <li>• Seek third-party independent review of your social responsibility performance.</li> <li>• Share best practices and lesson learned with the local partners, such as government bodies, industry associations, worker unions or representation, NGOs and local communities.</li> </ul>

## Appendix I: References for Minimum Requirements

	Minimum
Corporate responsibility	<p><b>M1</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution</a> of the Republic of Fiji;</li> <li>• Fiji <a href="#">Employment Relations Act 2007</a>;</li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs) of the Western and Central Pacific Fisheries; and</li> <li>• <a href="#">Harmonised Minimum Terms and Conditions</a> (HMTCs) of the Pacific Islands Forum Fisheries Agency</li> </ul> <p><b>M2</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1.2 Corporate responsibility and transparency S4</li> </ul>
Transparency	<p><b>M3</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1.2 Corporate responsibility and transparency S5 – S6, S8 – S9</li> </ul>

## Appendix II: Tools and Templates

	Tools	Templates
<b>Normative sources</b>	<p><b>Fiji national laws and policies</b></p> <ul style="list-style-type: none"> <li>Fiji <a href="#">Employment Relations Act 2007</a></li> <li>Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul> <p><b>Regional frameworks</b></p> <ul style="list-style-type: none"> <li><a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li><a href="#">Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> </ul> <p><b>ILO Conventions, protocols and recommendations</b></p> <ul style="list-style-type: none"> <li>ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a></li> </ul>	-
<b>Corporate responsibility</b>	<ul style="list-style-type: none"> <li>A Guide for Business: <a href="#">How to Develop a Human Rights Policy (Second Edition)</a>, UN OHCHR (2015)</li> <li><a href="#">UN Guiding Principles on Business and Human Rights</a> ("UNGPs"), United Nations</li> <li><a href="#">UN Guiding Principles on Business and Human Rights Reporting Framework</a>, Shift and Mazars (2015)</li> <li><a href="#">Human Rights Due Diligence: An Interpretive Guide</a>, UNDP</li> </ul>	<p><b>Forced labour</b></p> <ul style="list-style-type: none"> <li>Annex C: Sample Policy on Forced Labour and Other Forced Labour Conditions, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> <li>Annex H: Sample Policy on Humane Treatment, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> <li>Annex I: Sample Non-Discrimination Policy, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> <li><a href="#">Template Responsible Recruitment Policy</a>, FAIR Fish project, Plan International Thailand</li> <li><a href="#">Template No Forced Bonded Labour Policy</a>, FAIR Fish project, Plan International Thailand</li> <li><a href="#">Template Anti-Trafficking in Persons Policy</a>, FAIR Fish project, Plan International Thailand</li> </ul> <p><b>Child labour</b></p> <ul style="list-style-type: none"> <li>Annex A: Sample Policy on Child Labour &amp; Age Verification Procedures, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> </ul>

		<p><b>Occupational health and safety at sea</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Decent Working Conditions Policy Statement</a>, FAIR Fish project, Plan International Thailand</li> </ul> <p><b>Freedom of association and collective bargaining</b></p> <p>Annex J: Sample Freedom of Association Policy, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</p>
<b>Transparency</b>	-	-

## Appendix III: Glossary

Term	Definition	Source
<b>Corporate social responsibility ("CSR")</b>	A way in which enterprises give consideration to the impact of their operations on society and affirm their principles and values both in their own internal methods and processes and in their interaction with other actors. CSR is a voluntary, enterprise-driven initiative and refers to activities that are considered to exceed compliance with the law.	<a href="#">Corporate social responsibility</a> , ILO
<b>Fisher</b>	Every person employed or engaged in any capacity or carrying out an occupation on board any fishing vessel, including persons working on board who are paid on the basis of a share of the catch but excluding pilots, naval personnel, other persons in the permanent service of a government, shore-based persons carrying out work aboard a fishing vessel and fisheries observers.	ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a>
<b>Human rights due diligence</b>	An ongoing risk management process that a reasonable and prudent company needs to follow in order to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. It includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.	<a href="#">UN Guiding Principles Reporting Framework</a>