



Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2020/21)

* The term 'modern slavery' used in this survey is taken to include forced labour, slavery, human trafficking, servitude, bonded and child labour.

Company: Target

Canned Tuna Brands:

Owned Brands:

- Good & Gather
- Market Pantry

National Brands:

- Safe Catch
- Bumble Bee
- Chicken of the Sea
- Genova
- Blue Harbor Fish Co.
- Starkist
- Wild Planet

Human Rights Policy

1.

- a. Since January 2019, has your company introduced any **new** human rights policies to address the risk of **modern slavery*** in its operations or supply chains? Yes / No
If yes, please provide full details and a link.

No.

Our human rights policies are consistent with the information provided in 2019.

- b. Since January 2019, has your company **revised or updated** any of its existing human rights policies to address the risk of modern slavery in its operations or supply chains?

No.

2. Since January 2019, if your company has made a **new** commitment address **modern slavery** does it apply throughout your supply chains?

No, our policies were in place prior to 2019.

3. Since January 2019, has your company adopted or revised a responsible sourcing or **supplier code of conduct** that prohibits modern slavery?

No, our policies were in place prior to 2019. For more information, please reference our [Standards of Vendor Engagement](#), [Human Rights Statement](#), [Labor and Human and Rights Page](#) and [California Transparency in Supply Chains Act Disclosure](#).

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part? Yes / No

Yes.

5. Does the company source tuna from the **Pacific** region? Yes / No

Yes.

If yes, provide location (by country).

Our Owned Brand suppliers source tuna from Japan, Fiji, United States and Ecuador.

Our National Brand Suppliers source tuna from Japan, Thailand, Fiji, Mauritius, Solomon Islands, China, Vietnam, New Zealand, Philippines, Ecuador, and the United States.

6. Since January 2019, has your company adopted, or revised, a human rights due diligence policy, process or procedure to identify, assess and manage human rights risks (actual or potential), including modern slavery, in its operations (and those of its subsidiaries) and supply chains? Yes / No

If yes, please provide details and describe the human rights due diligence process. **Key steps include:** (i) identifying and assessing human rights impacts; (ii) integrating and acting on assessment findings; (iii) tracking the effectiveness of the company's response; and (iv) communicating externally about how the company is addressing its human rights impacts.

To increase our ability to identify human rights risks prior to production, we've added more up-front vetting and assessment procedures. This enables us to make better purchasing decisions from the start. Furthermore, we've expanded our supplemental forced labor oversight assessments to all facilities employing foreign workers which allows us to take more meaningful action on potential findings. Finally, one example of how we are communicating externally about our approach can be seen [here](#).

7. Since January 2019, has your company taken **practical action** to ensure that modern slavery does not occur in your company's (or its subsidiaries') operations and supply chains for tuna procurement from the Pacific? If yes, please describe.

Examples might include:

- i) *training* staff and management, workers, suppliers or business partners about rights, risks, responsibilities and remediation;
- ii) *engaging* with NGOs, fishers/ their representatives (including unions) and policy-makers;
- iii) cascading *contractual* clauses in supply agreements;
- iv) digital *traceability* of fish (across entire supply chain, or part only);
- v) prohibition on *recruitment fees*;

- vi) protective measures to protect against exploitation of *migrant* fishers;
- vii) prohibition on sourcing from suppliers that *transship* at sea, or use *flags of convenience*;
- viii) ensuring *freedom of association* and collective bargaining by fishers/ their representatives (including unions);
- ix) oversight of *recruitment* or labour hire entities; and
- x) independent supply chain *auditing*.

Please provide details.

Target continuously evaluates its risks and takes action based on those learnings. Since 2019 we have engaged in several of the types of initiatives mentioned above including:

- Training internal team members on risks
- Partnering with our suppliers on learning and risk mitigation initiatives. Recent examples include conducting IUU tracebacks with two of our tuna vendors
- Engaging with NGOs and advocating for best practices to Regional Fisheries Management Organizations
- Upholding the Employer Pays Principle on in our supply chains including performing focused assessments on responsible recruitment where we have foreign contract workers in our supply chains
- Conducting supply chain audits
- Requiring that any suppliers who trans-ship at sea adhere to best practices on monitoring and oversight, transparency, worker protections, and RFMO advocacy

8. If the company has taken steps to identify and address human rights risks, how does it (a) **prioritise** which risks to address first; and (b) assess and track the **effectiveness** of its actions and response?

Please see details in our [Vendor Code of Conduct](#), page 10, and our [Business Conduct Guide](#), on pages 7 and 33-35.

Grievance Mechanism

9. Since January 2019, per the [UN Guiding Principles on Business and Human Rights](#), has your company adopted, or made changes to improve, a **grievance/ complaints mechanism**

through which workers, including fishers in your supply chains, can raise concerns about human rights? Yes / No

If so, can they access this in their own language and in a way that allows grievances, or concerns, to be reported safely, in confidence and without intimidation? Have any human rights concerns connected with the Pacific tuna sector been reported via your company's complaints mechanism? Please provide details.

No changes since 2019. Target's remediation and corrective action plan process is outlined [here](#).

10. Since January 2019, have you introduced a corrective or **remediation plan** if instances of modern slavery are identified in your operations, or supply chains? Can you describe it?

To protect impacted workers, Target does not disclose details regarding specific instances of identifying forced labor indicators. Instead, we work collaboratively with our vendors to remediate when issues are found.

11. How many **instances** of modern slavery has your company **identified** over the last 3 years (from and including 2018) in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific?

Please describe by reference to:

- (a) Number of instances (broken down for each calendar year)
- (b) Do you know where they occurred? Please describe event(s).
- (c) How did the company respond to address the issue(s)?

To protect impacted workers, Target does not disclose details regarding specific instances of identifying forced labor indicators. Instead, we work collaboratively with our vendors to remediate when issues are found.

Reporting

12. Does your company communicate, or **report**, externally on steps taken to address modern slavery? Yes / No

Yes.

If yes, please provide relevant details, in period since January 2019. This could include statements issued under the [UK](#) or [Australian](#) Modern Slavery Acts.

Target reports on modern slavery publicly in our [Corporate Responsibility Report](#), specifically on page 24 as well as in our [California Transparency in Supply Chains Act Disclosure](#).

Other information

13. Since January 2019, has your company encountered **obstacles or challenges** in implementing its human rights commitments, taking practical action against modern slavery in tuna supply chains and/or in relation to any of the areas mentioned above? Yes / No

Yes.

If yes, please explain and provide details of any strategies to overcome them.

We believe in the power of the entities working together across value chains to provide more support for initiatives, increase demand from more sustainable raw materials and to bolster modern slavery elimination efforts. Therefore, our strategy to increase leverage and visibility in the supply chain has taken that approach. We have engaged in industry groups to align on priorities and advance collective efforts, engaged in RFMO advocacy, and shared expectations with our vendors formally through annual communication.

14. Since January 2019, has your company joined or been active in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing?

If yes, please provide details.

Yes, we are members of the Seafood Taskforce and the Global Dialogue on Seafood Traceability.

15. Please provide any **other information** about your company's policies and practices on human rights that may be relevant.

Target understands the intersection of human & labor rights with seafood traceability and IUU fishing. We work with FishWise to undertake annual due diligence activities that result in greater supply chain transparency and a better understanding of human and labor rights conditions. Bringing a holistic approach to human rights topics we are able to target our engagement and increase effectiveness with vendors.

COVID-19 impacts

16. Has the **COVID-19** pandemic affected your ability to identify, assess or respond to modern slavery risks in your tuna supply chains?

No.

Please explain and provide details, including any actions (a) taken or (b) delayed/suspended, by you.