



Canned Tuna Brands - Questions on Human Rights in Pacific Tuna Fishing Operations and Supply Chains (2018/19)

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

Company: Target Corporation

Human Rights Policy

1. Has your company made a public commitment to respect **human rights**? If so, please provide a link.

Target has made a public commitment to respect human rights in our supply chain, available [here](#).

2. If yes, does the company's commitment address **modern slavery*** and does it apply throughout your supply chains? Please provide details.

As laid out [here](#), Target does not tolerate any forced labor in its supply chain. Additional information regarding our efforts can be found in our CA Transparency in Supply Chain Act disclosure [here](#).

3. Does the company have a responsible sourcing or **supplier code of conduct** that prohibits modern slavery? Please provide details.

Please find our Standards of Vendor Engagement, which includes our policies regarding forced labor, [here](#).

Human Rights Due Diligence Process

4. Has your company **mapped** its tuna supply chains, in whole or part?

We have worked with our trusted seafood sustainability partner FishWise to conduct a mapping exercise with our seafood vendors, including our shelf-stable tuna vendors. We also have collected additional data from our vendors and their supply chain through NGO survey inquiries.

5. Does the company source tuna from the **Pacific** region?

Yes.

6. Does your company have 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?

Please leverage the following information:

- [Target's Labor and Human Rights Policies](#)
- [CA Transparency in Supply Chain Act Compliance](#)
- [Target's Social Compliance Audit Process](#)
- [Target's SocialCompliance Operations](#)

If so, 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* findings; (iii) *tracking* the effectiveness of the company's response; and (iv) *communicating externally* about how the company is addressing its human rights impacts.

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

Target continuously evaluates its risks and is currently taking further dedicated steps in this direction.

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.

9. Per the UN Guiding Principles on Business and Human Rights, does your company have a **grievance/ complaints mechanism** through which workers, including fishers in your supply chains, can raise concerns about human rights? 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 the company's complaints mechanism? Please provide details.

Target's remediation and corrective action plan process is outlined [here](#).

10. Do you have 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** in 2018 in its own operations (including subsidiaries) or in its supply chains that relate to tuna procurement from the Pacific? Do you know where they occurred and can you describe them? 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 the company communicate, or **report**, externally on steps taken to address modern slavery? If yes, please provide details.

Target reports on Forced Labor publicly in our [Corporate Responsibility Report](#), specifically on page 14.

Other information

13. 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? If so, 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. Does the company participate in any regional, or sectoral, **multi-stakeholder initiatives** that address modern slavery in fishing, eg:

a) [Seafood Task Force](#);

Yes

b) [Bali Process Government and Business Forum](#);

c) [Tuna 2020 Traceability Declaration](#); and

d) [other?](#)

If yes, please provide details.

Retail Canned Tuna Forum

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

Thank you.

Further information and guidance:

- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UK Modern Slavery Act \(2015\)](#)
- [Californian Transparency in Supply Chains Act](#)
- [ILO Forced Labour Convention, 1930 \(No. 29\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [ILO Work in Fishing Convention, 2007 \(No. 188\)](#)
- [Seafood Task Force](#)
- [Bali Process Government and Business Forum](#)
- [Tuna 2020 Traceability Declaration](#)
- [Mapping of Sustainable Development Goals to human rights instruments and issues](#)