

Company Name	Target Corporation
Industry	Agricultural Products & Apparel (Supply Chain only)
UNGP Core Score (*)	5.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
5.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: "Target respects individual human rights in every aspect of our business globally – from our supply chain to our stores, headquarters, operations and business partnerships, because we believe every person deserves to be treated with dignity and respect. We also follow all human rights laws that apply to our business." in addition the company also indicates that "We expect every team member and every business partner that works with us to show respect for human rights and follow all laws that protect human rights, including those that prohibit forced or compulsory labor, child labor and human trafficking." [Labor & Human Rights Policies, N/A: corporate.target.com & Target Corporation Code of Ethics, 03/19: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: In alignment with the UN Guiding Principles on Business and Human Rights, we respect human rights and seek to avoid adverse human rights impacts resulting from our business activities'. However, to be 'aligned' is not considered a formal commitment according CHRB wording criteria. [Human Rights Statement, 04/2020: corporate.target.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company discloses in its Human Rights Statement that 'In line with the Universal Declaration of Human Rights and the International Labor Organization Core Conventions, we are committed to respecting human rights throughout our operations'. However, to be 'in line' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Statement, 04/2020: corporate.target.com] • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO for AG suppliers: The vendor conduct guide's standards include most ILO core areas except collective bargaining. It explicitly covers child labour, forced labour discrimination and freedom of association. In relation to this last issue the guide states 'we seek suppliers who productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws'. No additional evidence found in the vendor code of conduct. [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com] • Not met: Explicitly list ALL four ILO for AP suppliers: The vendor conduct guide's standards include most ILO core areas except collective bargaining. It explicitly covers child labour, forced labour discrimination and freedom of association. In relation to this last issue the guide states 'we seek suppliers who productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws'. No additional evidence found in the vendor code of conduct. [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: Regarding its own operations, the Company includes on its Labor and Human Rights Policies website its position against forced and underage labor and discrimination. However, no reference found to freedom of association and collective bargaining. [Labor & Human Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Policies, N/A: corporate.target.com & Human Rights Statement, 04/2020: corporate.target.com</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: In its CSR Report 2019, it indicates: 'At Target, we are committed to the safety of our team members, guests, vendors, visitors and contractors.' [Corporate Social Responsibility Report 2019, 2019: corporate.target.com] • Met: H&S applies to AG suppliers: Regarding H&S the guides states that 'suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary'. [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com] • Met: H&S applies to AP suppliers: Regarding H&S the guides states that 'suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary'. [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com] • Not met: working hours for workers: On its website section 'Labor and Human Rights Policies', the Company indicates: 'Target expects a 60-hour maximum work week, including overtime, in all facilities. If local law differs, a facility must follow the stricter requirement. We also expect workers to receive a minimum of one full rest day after six consecutive work days. Both guidelines we adopted from the ILO.' However, no reference found to the standard 48 hours of work per week. [Labor & Human Rights Policies, N/A: corporate.target.com] • Met: Working hours for AP suppliers: On 'working hours and overtime' its Vendor Code of Conduct states, among other things, that 'suppliers must not allow working hours that exceed the applicable legal limit, or 60 hours per week, whichever is less. Regularly paid hours must not exceed 48 per week and overtime hours must not exceed 12 hours per week or the amount specified by local law, whichever is less'. 'Workers must have at least 1 full non-working day in every 7-day period'. [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company summarizes its stakeholder engagement activities by group. For instance, with team members: 'Confidential annual team member survey; Daily team member email; Employee Resource Groups; Executive leadership emails and videos; Focus groups and listening sessions; Human resources communications; Inclusion acumen training; Integrity Hotline; Volunteerism' [Stakeholder Engagement, N/A: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states in its Human Rights Statement that 'In alignment with the UN Guiding Principles on Business and Human Rights, we respect human rights and seek to avoid adverse human rights impacts resulting from our business activities. We are continuously working to do better, but if there are adverse impacts, our approach is to provide access to effective remedy'. However, it is not clear that the Company is formally committing to remedy, since the provision of access to remediation is its 'approach'. [Human Rights Statement, 04/2020: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Met: Collaborating with other remedy initiatives: The Company states on its website that partners with Better Work and Goodweave in countries where it operates to systematically address underage labor and remediate cases of underage labor when found in the apparel and rug industries, respectively. [Labor & Human Rights Policies, N/A: corporate.target.com] • Not met: Work with AG suppliers to remedy impacts: In its MSA Statement, the Company reports: 'If forced labor indicators are found in a supplier's production facility, we will work quickly to assess the situation and evaluate a variety of factors including the supplier's and facility's ability to remediate, the feasibility of providing meaningful remedy to impacted workers and the likelihood of sustained improvement. When remediation is achievable, the supplier is required to work with the facility, in consultation with Target and industry experts, to develop and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>implement an appropriate corrective action program in keeping with our 'do no harm' aspiration. If the situation is not conducive to remediation, then we will work to disengage responsibly from a facility'. However it is not clear how the Company actually works with supplier to implement remediation through the suppliers' own mechanisms, or working with them in the development of third party non-judicial mechanisms. [MSA Statement 2018, 2019: help.target.com]</p> <ul style="list-style-type: none"> • Not met: Work with AP suppliers to remedy impacts: In its MSA Statement, the Company reports: 'If forced labor indicators are found in a supplier's production facility, we will work quickly to assess the situation and evaluate a variety of factors including the supplier's and facility's ability to remediate, the feasibility of providing meaningful remedy to impacted workers and the likelihood of sustained improvement. When remediation is achievable, the supplier is required to work with the facility, in consultation with Target and industry experts, to develop and implement an appropriate corrective action program in keeping with our 'do no harm' aspiration. If the situation is not conducive to remediation, then we will work to disengage responsibly from a facility'. However it is not clear how the Company actually works with supplier to implement remediation through the suppliers' own mechanisms, or working with them in the development of third party non-judicial mechanisms. [MSA Statement 2018, 2019: help.target.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration (or each ILO Core area) or the UN Global Compact. • Met: Senior responsibility for HR: In its CSR Report 2018, the Company indicates: 'Jennifer Silberman oversees corporate responsibility across Target as the Vice President of Corporate Responsibility'. Sustainability strategies and targets include human rights, particularly in the supply chain. She regularly reports to the Nominating and Governance Committee. In addition, in its CSR Report 2019, the Company indicates: 'The vice president of Corporate Responsibility and the Corporate Responsibility team work with functional leaders across the company to determine strategies, policies and goals related to corporate responsibility and sustainability.' [Corporate Social Responsibility Report 2018, 2018: corporate.target.com & Corporate Social Responsibility Report 2019, 2019: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: Target discloses in its Human Rights Statement that 'Our Vice President of Corporate Responsibility has executive oversight, but day-to-day implementation of our human rights commitments are led by numerous teams. They are supported by a cross-functional taskforce that reviews and addresses emerging human rights issues on an as-needed basis'. [Human Rights Statement, 04/2020: corporate.target.com] • Met: Day-to-day responsibility for AG in supply chain: The Company indicates that 'Our responsible sourcing team has ongoing discussions with suppliers as they address the CAP requirements, focusing on steps taken, required timelines, factory accountability for ongoing monitoring, and long-term stability planning. An important part of this process is helping the vendor and factory identify the root causes of violations so they don't recur'. [Social Compliance Audit Process, N/A: corporate.target.com] • Met: Day-to-day responsibility for AP in supply chain: The Company indicates that 'Our responsible sourcing team has ongoing discussions with suppliers as they address the CAP requirements, focusing on steps taken, required timelines, factory accountability for ongoing monitoring, and long-term stability planning. An important part of this process is helping the vendor and factory identify the root causes of violations so they don't recur'. [Social Compliance Audit Process, N/A: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: In its CSR Report 2019, the Company indicates: 'In early 2019, we completed a Human Rights Impact Assessment (HRIA) that helped identify the salient human rights issues in our business and operations.' Also, in its Human Rights Statement the Company describes that 'take a risk-based approach to supply chain management, and we continually assess and address the risks that emerge and evolve over time'. However, no further details found describing the process to identify risks in own operations and the risks in supply chain. [Corporate Social Responsibility Report 2019, 2019: corporate.target.com & Human Rights Statement, 04/2020: corporate.target.com] • Not met: Identifying risks in AG suppliers • Not met: Identifying risks in AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): In its CSR Report 2019, the Company indicates: 'In early 2019, we completed a Human Rights Impact Assessment (HRIA) that helped identify the salient human rights issues in our business and operations.' Also, in its Human Rights Statement, the Company discloses that 'In adhering to our purpose and as part of our ongoing commitment to human rights, we conducted a mapping exercise to identify salient human rights issues across our business'. However, no further information found describing the process neither salient risk assessment and its context [Corporate Social Responsibility Report 2019, 2019: corporate.target.com & Human Rights Statement, 04/2020: corporate.target.com] • Not met: Public disclosure of salient risks: In its CSR Report 2019, the Company indicates: 'In early 2019, we completed a Human Rights Impact Assessment (HRIA) that helped identify the salient human rights issues in our business and operations.' However, no further information found, including salient human rights issues for the Company. [Corporate Social Responsibility Report 2019, 2019: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in AG supply chain • Not met: Including in AP supply chain • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 [Human Rights Statement, 04/2020: corporate.target.com] • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans

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			<ul style="list-style-type: none"> • Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its MSA Statement: 'Target also makes an Integrity Hotline available to Target team members, our suppliers and the workers in our suppliers' production facilities. The purpose of the Integrity Hotline is to provide a vehicle for anonymously reporting concerns dealing with potentially unfair, unlawful or unethical business practices and to maintain a system through which Target can investigate claims and address complaints.' [MSA Statement 2018, 2019: help.target.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The Company indicates that interpreters are available and its EthicsPoint website is available in 14 languages. In addition, on its website section 'Standards of Vendor engagement', it states: 'Report anonymously by calling the Integrity Hotline. The call is Free and handled by an independent 3rd party. Local language interpreters are also available.' [Standards of vendor engagement, N/A: corporate.target.com & EthicsPoint-Target, N/A: secure.ethicspoint.com] • Met: Opens own system to AG supplier workers: In its Vendor Code of Conduct the Company discloses the different channels available to report violations, all of which are from Target. It includes website, email, telephone and postal address. In addition, the Company states in its MSA Statement: 'Target also makes an Integrity Hotline available to Target team members, our suppliers and the workers in our suppliers' production facilities'. [Vendor Code of Conduct, 2020: corporate.target.com & MSA Statement 2018, 2019: help.target.com] • Met: Opens own system to AP supplier workers: In its Vendor Code of Conduct the Company discloses the different channels available to report violations, all of which are from Target. It includes website, email, telephone and postal address. In addition, the Company states in its MSA Statement: 'Target also makes an Integrity Hotline available to Target team members, our suppliers and the workers in our suppliers' production facilities'. [Vendor Code of Conduct, 2020: corporate.target.com & MSA Statement 2018, 2019: help.target.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: The Company states in its MSA Statement: 'Target also makes an Integrity Hotline available to Target team members, our suppliers and the workers in our suppliers' production facilities. The purpose of the Integrity Hotline is to provide a vehicle for anonymously reporting concerns dealing with potentially unfair, unlawful or unethical business practices and to maintain a system through which Target can investigate claims and address complaints.' However, the Company does not indicate whether external individuals and communities can make use of these mechanism/channel. [MSA Statement 2018, 2019: help.target.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company indicates that interpreters are available and its EthicsPoint website is available in 14 languages. However, there is no evidence to support the accessibility for external stakeholders to its grievance mechanisms. [EthicsPoint-Target, N/A: secure.ethicspoint.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system: See above • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system: See above
C.7	Remedying adverse impacts and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided

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	incorporating lessons learned		<ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them • Area: Forced labour • Story: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for retailers including Costco (Target and Home Depot) were often trapped in debt bondage and worked in conditions equivalent to forced labour. Specifically the drivers were said to be pressed into leasing trucks they could not afford, forced as a result to drive for up to 20 hours a day for pay that "sometimes drops to pennies on the hour", before being fired and having their vehicles taken, without compensation for the money the drivers had paid towards buying them. In 2018, the city of Los Angeles filed three lawsuits against some of the trucking companies named in the report. • Sources: [Huffington Post, 21/11/2017 -: huffingtonpost.com][USA Today, 09/01/18: eu.usatoday.com][USA Today, 16/06/2017 -: usatoday.com][Business and Human Rights, 24/05/2018 -: business-humanrights.org]
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public response available: The Company has responded on 24 May 2018 through a public statement available on Business and Human Rights Resource Center website. It stated 'Target appreciates the opportunity to provide input on proposals to address the labor practices by some drayage trucking companies at the ports of Los Angeles and Long Beach that were raised in recent news articles and shared by drivers who have testified about their personal experiences at the state capitol'. It also reiterates its various commitments, expectations and contractual obligations but does not however state whether it investigated the allegations with its own contractors nor whether it acknowledges or denies that its own contractors pressed drivers into leasing trucks, etc. Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Regarding its own operations, the Company includes on its Labor and Human Rights Policies website its position against forced and underage labor and discrimination. [Labor & Human Rights Policies, N/A: corporate.target.com & Human Rights Statement, 04/2020: corporate.target.com] • Met: Policies apply to the type of business relationships involved: The vendor conduct guide's standards explicitly covers child labour, forced labour discrimination and freedom of association [Vendor Code of Conduct, 2020: corporate.target.com & Standards of vendor engagement, N/A: corporate.target.com] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Regarding child or underage labour, the Vendor Conduct Guide states that 'We do not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. [...] Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work'. In addition, on its website section 'Labour and human rights policies', the Company indicates: 'During the responsible sourcing audit, personnel records are reviewed and the hiring process is discussed with management. Through this process, verification of established formal procedures ensuring review of age documentation, vetting of labor brokers and safeguarding of high-risk candidates, is undertaken.' Further more the Company is working with Better Work to remediate any cases of underage labor. [Vendor Code of Conduct, 2020: corporate.target.com & Labor & Human Rights Policies, N/A: corporate.target.com]
E(1).3	The Company has taken	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders

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	appropriate action		<ul style="list-style-type: none"> • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence: In its statement, the Company has indicated that 'we are committed to responsible business conduct and expect our suppliers to comply with our supplier standards and all applicable laws and regulations including those involving federal labor law, wage and hour requirements, and proper worker classification. These are not just expectations, but contractual obligations made clear in our contracts, supplier code of conduct, and supplier engagement standards. We encourage the Port authorities and other stakeholders to explore appropriate measures aimed at extending similar protections at the Port's operations'. However, it has not indicated what actions it took as a result of the allegations such as, for example, identifying the risks, investigating into the allegations, auditing contactors, monitoring progress, engaging with affected stakeholders or press contactors to engage with affected stakeholders, etc. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Twelve Tribe's Common Sense Farm linked of child labor in Cambridge, US • Area: Child labour • Story: The New York State Department of Labor found multiple violations of state child labour laws and abuse occurring at the Common Sense Farm in Washington County, New York, USA. The farm and production center location of religious sect 'Twelve Tribes' supplies soaps and skincare products to supermarkets including Walmart, Target, Amazon and Whole Foods. • Sources: [Times Union - 06/06/2018: dailymail.co.uk][Inside Edition - 01/06/2018: insideedition.com]
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: Target does not appear to have released a public statement concerning the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Target states that it has a "...zero-tolerance policy for underage labor." Target also states that in cases where child labor is found, the company will not accept any merchandise in production." [Labor & Human Rights Policies, N/A: corporate.target.com] • Met: Policies apply to the type of business relationships involved: Target policies dictate that it will not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. According to the company, an underage worker is any individual younger than the local minimum working age or the age of 15, whichever older, and/or those not abiding by the international standards as defined by the International Labor Organization (ILO) regarding age appropriate work governing family farming. Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work. [Standards of vendor engagement, N/A: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: As part of its auditing process, Target performs in-depth records and personnel file reviews and conducts employee interviews. If it finds underage labor at any factory, Target immediately reviews all aspects of the situation, and where possible, works with a credible 3rd party expert to develop and implement a comprehensive remediation plan in line with internationally defined best practices. If the remediation is unsuccessful or not possible, Target deactivates the factory for non-compliance. In all cases, Target does not accept any merchandise in production. Additionally, Target will partner with Better Work and Goodweave in countries where they operate to systematically address underage labor and remediate cases of underage labor when found in the apparel and rug industries, respectively. [Labor & Human Rights Policies, N/A: corporate.target.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: Company does not appear to have engaged with the affected stakeholders.

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			<ul style="list-style-type: none"> • Not met: Encourages linked business to engage affected stakeholders: There is no evidence that Target has encouraged linked business to engage the affected stakeholders. • Not met: Provides remedies to affected stakeholders: The company has not provided any sort of remedies, but press reports suggest that the company has looking into the issue. • Not met: Has reviewed management systems to prevent recurrence: The company has not reviewed any management systems in response to the allegations. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: The company has not provided any form of remedy to the victims. • Not met: Has improved systems and engaged affected stakeholders: The company does not appear to have improved systems or engaged any of the affected stakeholders.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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