

**Company Name** The TJX Companies  
**Industry** Apparel (Supply Chain and Own Operations)  
**UNGP Core Score (\*)** 4.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0.5	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
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
<b>Remedies and Grievance Mechanisms</b>		
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
<b>4.0</b>	<b>26</b>	

(\*) 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"> <li>• Met: General HRs commitment: The Company states in its code of conduct 'We are committed to acting as a good corporate citizen in the communities where we operate. At TJX, we respect human rights and believe it is important to seek out suppliers and other third parties who do so as well' [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The Company indicates that 'Our Social Compliance Program is inspired by the United Nations Guiding Principles on Business and Human Rights, and our commitment to these principles is reflected in our Vendor Code of Conduct and our responsible sourcing initiatives'. However, no evidence found of a publicly available statement of policy where it commits to the UN Guiding Principles on Business and Human Rights. [2019 Corporate Responsibility Report, 10/2019: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Not met: OECD</li> </ul>
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"> <li>• Not met: ILO Core: The Company's own code of conduct does not cover all four ILOs, only No discrimination. Also, in its Corporate Responsibility Report 2019, the Company states 'at TJX, we are committed to treating people with dignity, fairness, and respect. Both our TJX Global Code of Conduct, which applies to all of our employees (Associates) worldwide, and our Vendor Code of Conduct, which applies to our merchandise vendors, reflect these principles and prohibit involuntary or forced labor'. No evidence found of a commitment to respect the human rights that the ILO has declared to be fundamental rights at work. [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a> &amp; 2019 Corporate Responsibility Report, 10/2019: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: The vendor code of conduct includes commitments in relation to child labour, forced labour and discrimination. In relation to freedom of association and collective bargaining, it states that 'our vendors must respect the rights of their workers to choose (or choose not) to freely associate and bargain collectively where such rights are recognized by law'. However, it is not clear if it is committed to respect those rights in all contexts (even through alternative negotiation mechanisms). [Vendor Code of Conduct (website, updated), N/A: <a href="http://tjx.com">tjx.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Met: Respect H&amp;S of workers: With regards to health and safety the Company states in its code of conduct 'We work hard to provide clean, safe, and accessible facilities for our customers and our fellow Associates and to protect each other and our customers from avoidable injury in the workplace. Our Company implements global safety policies and procedures to protect and preserve our well-being.' [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: With regards to health and safety the Company states in its Vendor code of conduct 'Our vendors must provide their workers with safe and healthy conditions, including in any living facilities that may be provided.' [Vendor Code of Conduct (website, updated), N/A: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Not met: working hours for workers: Its Global Code of Conduct states: 'We follow all applicable wage and hour laws and regulations. This includes a prohibition of working without compensation (sometimes referred to as working "off the clock") or working during meal and rest breaks, as well as requirements related to overtime pay, termination pay, minimum wage, and hours and payment</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			of minors.' However there is no mention to respect maximum working hours following ILO conventions on labour standards on working hours. [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a> ] <ul style="list-style-type: none"> <li>Not met: Working hours for AP suppliers: The vendor code states that 'our vendors must not require their employees, on a regularly scheduled basis, to work in excess of 60 hours per week (or fewer hours if prescribed by applicable laws and regulations). All overtime must be voluntary and must be fully compensated in accordance with the requirements of local law, and except in extraordinary circumstances, employees must be entitled to at least one day of rest in every seven-day period'. However, no reference found to regular working week hours. [Vendor Code of Conduct (website, updated), N/A: <a href="http://tjx.com">tjx.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to stakeholder engagement: The Company states on its website 'We strongly believe that for our policies and practices to be effective, they must evolve and be informed by the perspectives of our many stakeholders, including our Associates, customers, investors, and others. Therefore, we strive to maintain an open dialogue with these important groups to achieve our goals'. However, no evidence found of a formal commitment to engage with potentially and actually affected stakeholders. [Stakeholder engagement (updated), 13/8/2019: <a href="http://tjx.com">tjx.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Regular stakeholder engagement</li> <li>Not met: Commits to engage stakeholders in design</li> <li>Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Not obstructing access to other remedies</li> <li>Not met: Collaborating with other remedy initiatives: The Company indicates that 'Integral to the success of our compliance program is ongoing involvement and partnerships between TJX, our ethical sourcing experts – UL, Intertek, and Omega, our buying agents, and vendors to address shortcomings identified in audits and to work toward improvement'. However, no evidence found of a commitment to collaborating in initiatives that provide access to remedy. [2019 Corporate Responsibility Report, 10/2019: <a href="http://tjx.com">tjx.com</a>]</li> <li>Met: Work with AP suppliers to remedy impacts: The Company reports on its practices in its CR report 2017: 'At the conclusion of an audit, a copy of the CAP is left with management to assist them in resolving any violations or deficiencies detected during the audit. To encourage collaboration between our buying agents and vendors, a copy of the CAP is also forwarded to both parties' attention shortly following a third-party audit. TJX receives a copy as well. [...] where moderate to more serious violations of the Vendor Code of Conduct or the local laws are detected, we require that our third-party representatives re-audit the factory. Problems are tracked and factories are notified of the expectation of remedial action. [...] Integral to the success of our compliance program is ongoing involvement and partnerships between TJX, UL, Intertek, Omega, our buying agents, and vendors to address shortcomings identified in audits and to work toward improvement.' [Corporate Responsibility Report 2017, 2017: <a href="http://tjx.com">tjx.com</a>]</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to ILO core conventions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Senior responsibility for HR: The Company states that 'Our Social Compliance Program is included as part of our ongoing enterprise risk assessment, and, as such, our Senior Vice President (SVP), Chief Risk and Compliance Officer, has responsibility for global social compliance. [...] Program management is overseen by the Assistant Vice President (AVP), Global Social Compliance, who works closely with representatives of our merchandise and purchasing functions across all of TJX's businesses and with the Global Social Compliance Committee. This Committee is comprised of senior leadership from the U.S., Canada, and Europe and from relevant disciplines within TJX, including Merchandising, Sourcing, Imports, Compliance, Enterprise Risk Management, Legal, and Global Communications. The Committee meets on a regular basis, oversees compliance of TJX's ethical sourcing initiatives, and serves in an advisory capacity, helping to guide the strategy and execution of the program. Our international buying offices and merchants also play key roles in achieving our goals.' [Global Social Compliance Program (updated), 13/8/2019: <a href="http://tjx.com">tjx.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: The Company indicates that 'responsibility for social compliance spans our organization, with our international buying offices and merchants also playing key roles in achieving our goals'. However, it is not clear which staff position or business function has day-to-day responsibility for human rights within the Company. [2019 Corporate Responsibility Report, 10/2019: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
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"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
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"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
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"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Including AP suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## 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"> <li>• Met: Channel accessible to all workers: The Company states in its Global Code of Conduct 'The TJX Helpline is an additional resource available to allow you to voice your concerns (subject to local law or regulation, which may limit certain kinds of reporting). It is staffed by an outside service provider around the clock, every day of the year. Providing details when you call the Helpline can assist TJX in answering your questions or resolving your concerns more promptly. Although you are encouraged to identify yourself, you may remain anonymous when calling the Helpline unless doing so is prohibited by local law or regulation. Regardless of whether you choose to identify yourself, anything you discuss with the Helpline will be handled with appropriate attention to confidentiality'.</li> </ul> This Channel is accessible to all Associates, which are defined as 'Everyone employed by TJX, to report any concern about a violation of the Code which include some human rights issues such as discrimination, health and safety and working hours. [Global Code of Conduct: <a href="http://tjx.com">tjx.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Met: Opens own system to AP supplier workers: In its CR Report 2018, the Company indicates: ' External stakeholders may reach us via any of the phone numbers or addresses listed by locality on the "Contact Us" section of our corporate website.' [Corporate Responsibility Report 2017, November 2018: <a href="http://tjx.com">tjx.com</a>]</li> </ul>
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"> <li>• Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: After an audit 'For lower-risk deficiencies, our buying agents or direct vendors are expected to provide evidence to us demonstrating that remedial action has been carried out. However, where moderate to more serious violations of the Vendor Code of Conduct or the local laws are detected, we require that our third-party representatives re-audit the factory. Problems are tracked and factories are notified of the expectation of remedial action. Our goal is to have re-audits complete within six months of the prior audit'. However, no evidence found of a particular case describing the approach it took to provide or enable a timely remedy for victims. [2019 Corporate Responsibility Report, 10/2019: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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"> <li>• Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them</li> <li>• Area: Forced labour</li> <li>• Story: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for a number of retailers including TJX Companies 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.</li> <li>• Sources: [Huffington Post, 21/11/2017 -: <a href="http://huffingtonpost.com">huffingtonpost.com</a>][USA Today, 16/06/2017 -: <a href="http://usatoday.com">usatoday.com</a>][Naples Daily News, 09/01/2018: <a href="http://eu.naplesnews.com">eu.naplesnews.com</a>][USA Today, 09/01/18 -: <a href="http://eu.usatoday.com">eu.usatoday.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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"> <li>• Met: Public response available: In the USA Today article the spokesperson for the company says that 'We take these concerns very seriously at TJX' [USA Today article regarding truckers: <a href="https://usatoday.com">https://usatoday.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	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"> <li>• Met: Company policies address the general issues raised: In its Corporate Responsibility Report 2019, the Company states 'at TJX, we are committed to treating people with dignity, fairness, and respect. Both our TJX Global Code of Conduct, which applies to all of our employees (Associates) worldwide, and our Vendor Code of Conduct, which applies to our merchandise vendors, reflect these principles and prohibit involuntary or forced labor' [Annual Report 2017, 2017: <a href="http://tjx.com">tjx.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: See above [Annual Report 2017, 2017: <a href="http://tjx.com">tjx.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>
E(1).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"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

### 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark

only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

#### COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org)