

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name TJX Companies
Industry Apparel (Supply Chain and Own Operations)
Overall Score (*) 13.8 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
0.6	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
2.9	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • 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: tjx.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core: The Company's own code of conduct does not cover all four ILOs, only No discrimination. [Global Code of Conduct: tjx.com] • Not met: UNGC principles 3-6 • Met: All four ILO for AP suppliers: The Company's 'Vendor Code of Conduct' requires its suppliers to not use child labour, forced labour, to respect the rights of their workers to choose (or choose not) to freely associate and to bargain collectively, and to prohibit discrimination. [Vendor Code of Conduct (website): tjx.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core: See above [Global Code of Conduct: tjx.com] • Met: Respect H&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: tjx.com] • Met: H&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): tjx.com] • Not met: working hours for employees: 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 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: tjx.com] • Met: Working hours for AP suppliers: As for working hours it states '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)'. [Vendor Code of Conduct (website): tjx.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water: Its Vendor Code of Conduct states: 'Our vendors are strongly encouraged to protect the environment by: operating in a sustainable manner, where possible; conserving and protecting resources, such as water and energy; and taking into consideration environmental issues that may impact local communities'. However, the Company has not disclosed any documents stating its own commitment to respect the right to water and sanitation. [Vendor Code of Conduct (website): tjx.com] • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	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: Commits to stakeholder engagement: The Company only 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. Therefore, we strive to maintain an open dialogue with these important groups to achieve our goals'. The listed stakeholders include Associates, Customers and Investors. The Company has not disclosed any public documents stating its commitment to engage with potentially and actually affected stakeholders (including in local communities). [Stakeholder Engagement: tjx.com] • Not met: Regular stakeholder engagement <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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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.' [Global Social Compliance Program: tjx.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • Not met: Expects AP suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: CEO or Board approves policy: Its Global Code of Conduct is signed by the Company's CEO, which include a general statement to respect human rights but does not cover all ILO core. [Global Code of Conduct: tjx.com] • Not met: Board level responsibility for HRs Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key AP HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior responsibility fo HR (inc ILO): The Company's policies do not cover all ILO core areas including both its own operations and supply chain. Although in its website section 'Global Social Compliance', the Company indicates: 'Our Social Compliance 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 and oversees compliance of TJX's ethical sourcing initiative, which is coordinated by our Assistant Vice President (AVP), Global Social Compliance, who has specific responsibility for managing and overseeing our Ethical Sourcing Program. This Global Social Compliance position reports to the Senior Vice President, Chief Risk and Compliance Officer, and works closely with representatives of the different purchasing functions across all of TJX's businesses and with the Social Compliance Committee.' [Global Social Compliance Program: tjx.com] Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key AP HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Communicates its policy to all workers in own operations: Its Global Code of Conduct does not cover all ILO core. [Global Code of Conduct: tjx.com] Score 2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Steps to communicate policy commitments to BRs: The Company states in its CR report 2017 'We and our representatives work closely with our agents and vendors so that they understand our social compliance program and our Vendor Code of Conduct. Our merchants also play an important role in educating suppliers on our social compliance program requirements and encouraging them to make improvements at their facilities, when necessary. We created the TJX Global Social Compliance Manual, which contains, among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process. This tool is available in seven languages and offers detailed information designed to help our agents, vendors and factory management better understand the expectations of our Vendor Code of Conduct, as well as the monitoring and corrective action processes. We require our buying agents to disseminate this manual to their entire TJX vendor base.' [Corporate Responsibility Report 2017, 2017: tjx.com] • Not met: Including to AP suppliers: According to the definition of Vendors included in its Vendor Code of Conduct, it is not clear if the Company requires its suppliers to communicate the Code down the supply chain. [Corporate Responsibility Report 2017, 2017: tjx.com] Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on AP suppliers
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Trains all workers on HR policy commitments: The company states in its CR report 2017: 'Since 2005, we have conducted 125 training sessions for our buying agents, vendors and factory management. Sessions have been held in China, Korea, Taiwan, Turkey, India, Indonesia, the Philippines, Thailand, Vietnam and the United States. These training sessions were conducted by either UL or Intertek representatives, who were accompanied by our AVP, Global Social Compliance. We believe that the presence of our management at each of these sessions in each of these countries demonstrates to factory management, buying agent management and vendors that TJX is committed to our social compliance program'. However, the Company has not published any documents in which it indicates that it trains all relevant managers and workers (including its own workers) on the human rights commitment(s) including all ILO core standards as a minimum. [Corporate Responsibility Report 2017, 2017: tjx.com] • Met: Trains relevant managers including procurement: See above Score 2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Monitoring implementation of HR policy commitments: Its Global Code of Conduct does not cover all ILO core. [Global Code of Conduct: tjx.com] • Met: Monitoring AP suppliers: On its website, section 'Global Social Compliance Program', the Company describe its monitoring and auditing process: 'Together with our representatives, we work closely with our agents and vendors so that they understand our Social Compliance Program and our Vendor Code of Conduct. [...] We created the TJX Global Social Compliance Manual, which contains, among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process. [...] Factories manufacturing the products we design are required to undergo periodic audits to ensure adherence to our Vendor Code of Conduct. [...] On-site audits generally include one to two full working days at each audited factory, and include the following components:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Interview with factory management (opening meeting) Policy, payroll, and documentation review; Factory walk-through; Health and safety inspection; Chemical and hazardous materials review, including usage information and verification of Material Safety Data Sheets, chemical safety, and hazardous waste programs; Confidential worker interviews; Debrief with factory management (closing meeting).</p> <p>Our AVP, Global Social Compliance, and International Buying Office Associates participate in shadow audits with auditors. Shadowing is practiced to gain a better understanding of the compliance audit process and challenges, and to better aid TJX in our review of both our audit results and, more broadly, our program's effectiveness.' [Global Social Compliance Program: tjx.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action: It also describe corrective action process: ' At the conclusion of an audit, a Corrective Action Plan (CAP) is created and concerns are discussed by the auditors with factory management. Factory management is requested to sign the CAP to verify their understanding of the findings. In certain cases, we may require our third-party monitors to re-audit the factory. Our goal is to have re-audits complete within six months of the prior audit, and we strive to work with factories to continuously improve their operations.' However, there is no information about the numbers of incidence. [Global Social Compliance Program: tjx.com] • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: In its CR Report 2017, the Company indicates: 'In choosing third parties to work with, our Associates must select those that act with integrity and in a manner consistent with the ethical principles stated in our Code.' [Corporate Responsibility Report 2017, 2017: tjx.com] • Met: HR affects on-going supplier relationships: On its website, section 'Global Social Compliance Program', the Company indicates: 'There are several issues that we consider "zero tolerance" issues. That is, we would immediately terminate the relationship if a factory is found to be in violation of this aspect of our program, including for example, issues like bribery/corruption; child, prison, slave, or forced labor; human trafficking; maintaining a facility with all doors and/or exits locked; use of chemicals banned in that region; and failure to pay any wages. [...] Though we strive to work with vendors to address and resolve shortcomings in their operations, under extreme circumstances, we must conclude that we can no longer do business with certain factories, or that they will be precluded from producing goods for us until they demonstrate that they have addressed the situation and have put management systems in place to prevent a recurrence.' [Global Social Compliance Program: tjx.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met [Global Social Compliance Program: tjx.com] • Not met: Working with suppliers to improve performance: It also indicates: 'Our preferred approach, however, is to work with vendors whenever possible to address and resolve issues identified during audits of their facilities because the reality is that improving working conditions in factories in underdeveloped countries is an ongoing effort. TJX, like other retailers, is facing this challenge. Our goal, when possible and reasonable, is continuous improvement of conditions at factories. This is preferable to ceasing business with these factories and gives us the ability to influence positive change. We believe that this "continuous improvement" model is in the best interest of the workers in the facilities from which we source goods. 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.' However, CHRB could not find information about an specific example of this process. [Global Social Compliance Program: tjx.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: workers in the SP engaged: In its website section 'Stakeholder Engagement' the Company refers only to its Associates, Customers and Investors. [Stakeholder Engagement: tjx.com] • Not met: communities in the SC engaged: See above [Stakeholder Engagement: tjx.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifying risks in own operations • Not met: Identifying risks in AP suppliers Score 2 • 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
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including in AP supply chain Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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	<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: 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'. <p>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: tjx.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect AP supplier to have equivalent grievance systems • Met: Opens own system to AP supplier workers: In its CR Report 2017, 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 tjx.com' [Corporate Responsibility Report 2017, 2017: tjx.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • Met: Public statement prohibiting retaliation: In its Global Code of Conduct, the Company indicates: 'TJX will not tolerate any form of retaliation against, or victimization of, Associates or others [the channel is open to stakeholders] for making good-faith reports of possible violations of the Code, or for asking questions about the Code, Company policies, or applicable laws. Anyone who retaliates (or attempts to do so) will be subject to disciplinary action in accordance with Company policies and applicable law.' [Global Code of Conduct: tjx.com] <ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-	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: Won't impede state based mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
	based judicial and non-judicial grievance mechanisms		<ul style="list-style-type: none"> • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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"> • Not met: Describes how remedy has been provided: The Company describes a Remediation process on its website section 'Global Social Compliance Program': '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. There are several issues that we consider "zero tolerance" issues. That is, we would immediately terminate the relationship if a factory is found to be in violation of this aspect of our program, including for example, issues like bribery/corruption; child, prison, slave, or forced labor; human trafficking; maintaining a facility with all doors and/or exits locked; use of chemicals banned in that region; and failure to pay any wages. When a problem requires remediation, we expect that continuous improvement is verified during the re-audit. Our general goal is that each re-audit demonstrates measurable improvement from the prior audit. If a factory receives several consecutive noncompliant grades, this pattern may suggest that required remedial action is not being undertaken.' All this is an assessment of what is done in cases of violation of code but there is no detail of remedy to victims. [Global Social Compliance Program: tjx.com] Score 2 <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks • 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

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source (farm, ranch etc) Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why

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D.2.4.a	Child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not use child labour • Not met: Age verification of applicants and workers Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.2.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company states in its Vendor code of conduct 'Our vendors must not use child labor. The term "child" is defined as anyone younger than 15 years of age (or younger than 14 years of age where the law of the country of manufacture allows 14-year-olds to work). However, in countries where the legal age for completing compulsory education is higher than 15, then we define "child" as anyone younger than the age for completing compulsory education.' However the Company makes no reference to verification of ages of jobs applicants and workers or to remediation programmes. The Company makes a reference to a 'Global Social Compliance Manual' in its website section 'Global Social Compliance Program', 'which contains, among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process', but CHRB could not find this document. [Vendor Code of Conduct (website): tjx.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour
D.2.5.a	Forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts [Global Social Compliance Program: tjx.com] • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.c	Forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: The Company states in its Vendor code of conduct 'Our vendors must respect the rights of their workers to choose (or choose not) to freely associate and to bargain collectively where such rights are recognized by law'. However, there is no specific mention of prohibition of intimidation, harassment, retaliation and violence against trade union members and trade union representatives. [Vendor Code of Conduct (website): tjx.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosure • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements: In its Vendor Code of Conduct document the Company indicates: 'Our vendors must provide their workers with safe and healthy conditions, including in any living facilities that may be provided.' However, it does not provide any specific requirement or guidelines. The Company makes a reference to a 'Global Social Compliance Manual' in its website section 'Global Social Compliance Program', 'which contains, among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process', but CHRB could not find this document. [Vendor Code of Conduct (website): tjx.com & Global Social Compliance Program: tjx.com] Score 2 <ul style="list-style-type: none"> • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.2.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: In its Global Code of Conduct, the Company indicates: 'We do not tolerate harassment at TJX. As TJX Associates, we are all expected to act in a professional manner and to avoid any action or behaviour that, if unwelcome, may be considered harassment or sexual harassment. "Harassment" includes any conduct that unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or otherwise offensive environment. Harassment can take many forms, including using slurs, epithets, inappropriate gestures, or making demeaning jokes. Regardless of the form it takes, behaviour like this is not tolerated.' However there is no further information about its processes to prohibit harassment, intimidation and violence against women. [Global Code of Conduct: tjx.com] <ul style="list-style-type: none"> • Not met: Working conditions take account of gender

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Equality of opportunity at all levels: The Company indicates in its 'UK Gender Pay Gap Statement': 'The principle of equal pay has been part of UK law for many years, and generally means that men and women in comparable positions receive the same pay for doing the same work. At TJX, we value and uphold this principle and are committed to the belief that individuals should be compensated competitively and equitably based on their role and skills. [...] We are working to better understand the factors that drive our gender pay gap to help us make informed decisions in the future. This will include learnings from our Inclusion and Diversity Group and the support of an external consultancy. Even if our mean and median gender pay gap is in line with many other retailers and below the national average, we are committed to continuing to foster a diverse and inclusive environment that provides equally attractive and accessible opportunities throughout our organisation for all associates to fulfil their potential.' It also indicates: 'Globally at TJX, women make up approximately 77% of our workforce and fill about 65% of our managerial positions. As with our global business, we have a strong representation of female leaders throughout management levels in our UK business, including our President. [...] We believe it is important to continue to create opportunities for professional growth to further the development of women throughout our organisation. At the same time, we are continuing to cultivate a landscape where roles across all quartiles and throughout our business are equally attractive and accessible to both women and men.' [UK Gender Pay Gap Statement: tjx.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Meets all of the requirements under score 1
D.2.8.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirement under score 1 met Not met: Provide analysis of trends in progress made
D.2.9.a	Working hours (in own production or manufacturing operations)	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: Respects max hours, min breaks and rest periods in its own operations <p>Score 2</p> <ul style="list-style-type: none"> Not met: How it implements and checks this
D.2.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: The Company states in its Vendor code of conduct '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'. The Company has not described how these practices are taken into account positively in the identification and selection of suppliers. It makes a reference to a 'Global Social Compliance Manual' in its website section 'Global Social Compliance Program', 'which contains, among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process', but CHRB could not find this document. Not met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them • Sources: Huffington Post, 21/11/2017 - huffingtonpost.com USA Today, 16/06/2017 - usatoday.com Naples daily News, 30/06/2017 - eu.democratandchronicle.com Naples Daily News, 09/01/2018 eu.naplesnews.com USA Today, 09/01/18 - eu.usatoday.com • Allegation: 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.
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"> • Met: Public response available: In the USA Today article the spokesperson for the company says that 'We take these concerns very seriously at TJX' <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
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"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
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"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders <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

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.92 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, TJX Companies made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 0.92 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: In its website the Company indicates: 'TJX provides an index of our corporate responsibility reporting mapped against the Global Reporting Initiative's (GRI) Sustainability Reporting Framework guidelines.' [Global Reporting Initiative: tjx.com]
F.3	Key, High Quality Disclosures	0 out of 4	<p>TJX Companies met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p>

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.2.1.a : Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.2.7.a : Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, 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.